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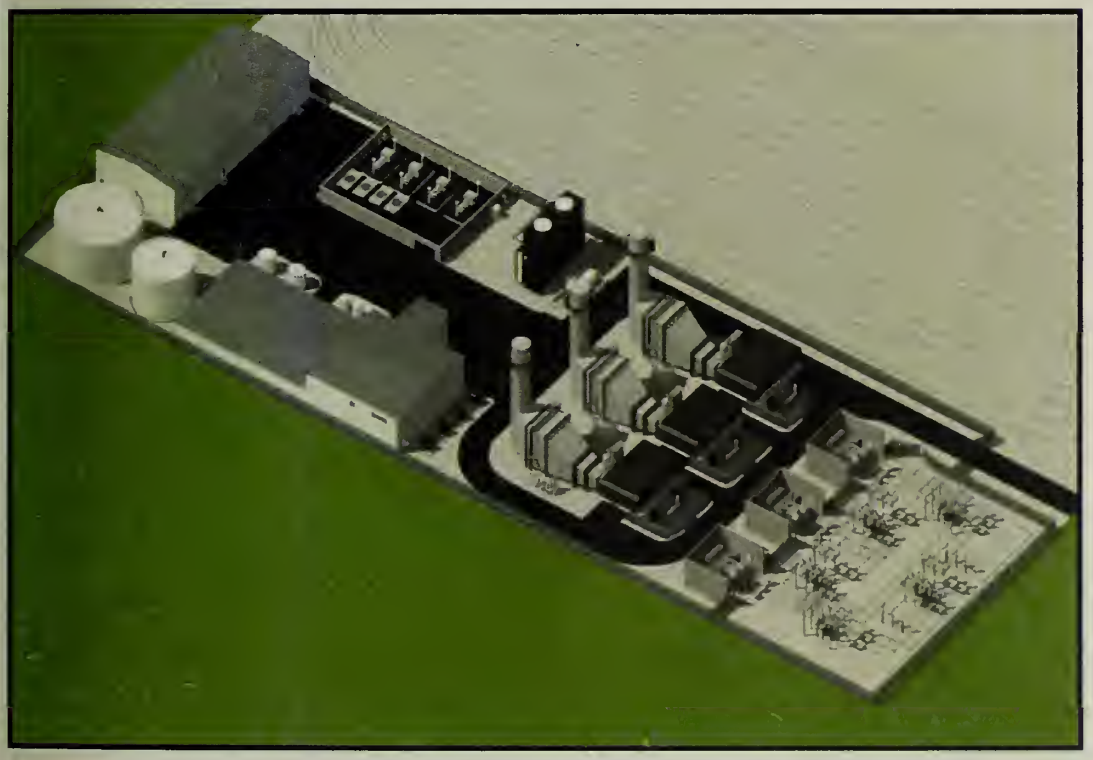
Preliminary Staff Assessment

CALIFORNIA ENERGY COMMISSION

SAN FRANCISCO ELECTRIC RELIABILITY PROJECT

Application For Certification (04-AFC-1)
The City and County of San Francisco



STAFF REPORT

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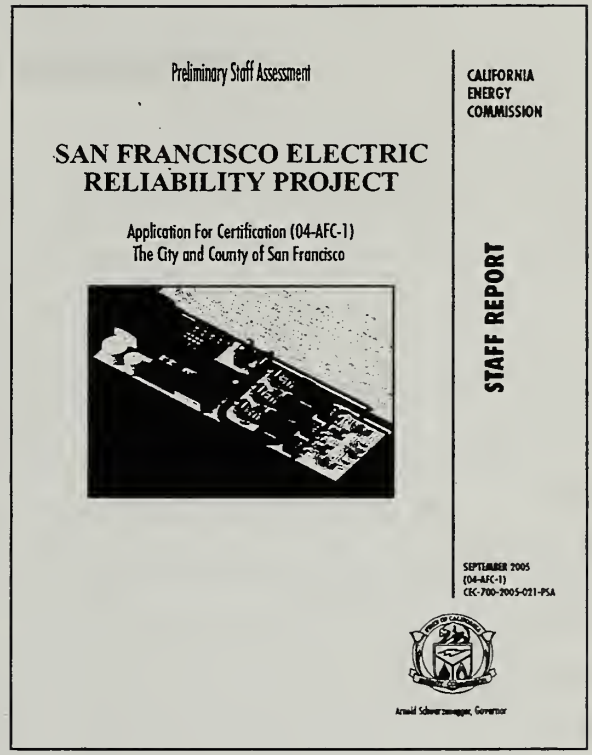

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SAN FRANCISCO ELECTRIC RELIABILITY PROJECT
04-AFC-1

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EXECUTIVE SUMMARY

William Pfanner

INTRODUCTION

The Preliminary Staff Assessment (PSA) contains the California Energy Commission staff's independent evaluation of the San Francisco Electric Reliability Project Supplement A (SFERP) Application for Certification (04-AFC-1). This PSA examines engineering, environmental, public health and safety aspects of SFERP, based on the information provided by the applicant (the City and County of San Francisco (CCSF) and other sources available at the time the PSA was prepared. The PSA contains analyses similar to those normally contained in an Environmental Impact Reports (EIR) required by the California Environmental Quality Act (CEQA). When issuing a license, the Energy Commission is the lead state agency under CEQA, and its process is functionally equivalent to the preparation of an EIR. After a 30-day public comment period on the PSA, staff will issue its testimony in the form of the Final Staff Assessment (FSA).

The Energy Commission staff has the responsibility to complete an independent assessment of the project's engineering design and its potential effects on the environment, the public's health and safety, and whether the project conforms with all applicable laws, ordinances, regulations and standards (LORS). The staff also recommends measures to mitigate potential significant adverse environmental effects and conditions of certification for construction, operation and eventual closure of the project, if approved by the Energy Commission.

This PSA is not the decision document for these proceedings nor does it contain findings of the Energy Commission related to environmental impacts or the project's compliance with local/state/federal legal requirements. The FSA will be the next iteration of staff analysis, and will serve as staff's testimony in evidentiary hearings to be held by the Committee of two Commissioners who are hearing this case. The Committee will hold evidentiary hearings and will consider the recommendations presented by staff, the applicant, all parties, government agencies, and the public prior to proposing its decision. The Energy Commission will make the final decision, including findings, after the Committee's publication of its proposed decision.

PROJECT LOCATION AND DESCRIPTION

On March 18, 2004, the CCSF submitted an AFC to construct and operate a simple cycle power plant, referred to as the San Francisco Electric Reliability Project (SFERP), initially to be located at the former Potrero power plant site owned by Mirant Corporation. An amendment to the project application, Supplement A, was filed by CCSF with the Energy Commission on March 25, 2005, involving the relocation of the proposed project to a site approximately 1/4 mile south of the original project site. The new location is a 4-acre parcel owned by the CCSF located south of 25th Street and approximately 900 feet east of Illinois Street. The new project site is located near the San Francisco Bay in the Potrero District of Southeast San Francisco, adjacent to

CCSF's planned Municipal Transportation Agency (MUNI) Metro East Light Rail Vehicle Maintenance and Operations Facility.

The SFERP will consist of a nominal 145-megawatt (MW) simple-cycle plant, using three natural gas-fired General Electric LM 6000 gas turbines and associated infrastructure. The SFERP power plant switchyard would consist of five circuit breakers organized in a three-phase ring configuration. Two three-phase 115 kV underground transmission circuits would connect the power plant switchyard to the Potrero substation. Both the SFERP site and the Potrero substation will have underground-to-aboveground transition structures at the connection points.

A pipeline tie-in will be made to the existing PG&E natural gas transmission line at the intersection of Illinois and 25th streets. Natural gas for the facility will be delivered through a new 900-foot-long, 12-inch-diameter (or less) pipeline. This service will be connected to a booster compressor station that will be part of the SFERP facility.

Process water for the project will be obtained via a water pump station (WPS) located on Marin Street near Cesar Chavez Street which will connect to a new recycled water plant located on the southern portion of the project site. The City will provide wastewater effluent for the onsite recycled water treatment plant. The WPS will be located in an existing combined sewer system structure and will include three variable power drive pumps (two operational and one standby). A 0.7mile long pipeline will connect the WPS and the SFERP's onsite recycled water treatment system. The onsite treatment system will be designed to produce Title 22 quality recycled water for industrial use at the SFERP. Plant wastewater and reject water from the SFERP wastewater treatment system will be discharged into the City's combined sewer system, which routes the waste to the City of San Francisco Southeast Water Pollution Control Plant.

Stormwater will be collected onsite during operations and will be directed to the stormwater collection system at the adjacent MUNI Metro East site. Their system then discharges the stormwater into the combined sewer system. The plant's design will incorporate air pollution emission equipment designed to meet the best available control technology standards required by the Bay Area Air Quality Management District (BAAQMD).

Site access will be provided via 25th Street at the northern side of the plant site. The plant will be accessed from 25th Street via Illinois Street, with vicinity access via Interstate 280. The site for SFERP is City-owned property. The San Francisco Public Utilities Commission (SFPUC) is pursuing a memorandum of understanding, based on a signed letter of intent for an option to transfer the beneficial use of the property from the MUNI, another City department, to the SFPUC. The memorandum of understanding will be subject to approval by MUNI's Board of Directors, the Public Utilities Commission and the San Francisco Port Commission.

PUBLIC AND AGENCY COORDINATION

On April 4, 2005, the Energy Commission staff provided the new Supplement A project description to a comprehensive list of libraries, agencies, organizations and

residences/business within one mile of the proposed project. The Commission staff's explanation letter requested public and agency review, comment, and continued participation in the Energy Commission's certification process.

On May 6, 2005, an Information Hearing and a Site Visit for the SFERP were conducted at the Potrero Neighborhood House. Immediately following the Information Hearing and Site Visit, the Commission staff held a workshop to discuss the applicant's Responses to Data Requests and to resolve issues.

Staff also attended two community presentations sponsored by the CCSF including an open house with the Bayview Hunters Point Neighborhood on June 20, 2005, and an open house with the Potrero/Dogpatch Neighborhood on June 21, 2005.

Staff has worked closely with key agencies in the preparation of the PSA, including agency participation at the Information Hearing and workshops and through communication with the City and County of San Francisco, Bay Area Air Quality Management District (BAAQMD), the Department of Toxic Substances Control, the National Marine Fisheries Service, and the United States Fish and Wildlife Services.

All comments on this PSA will be taken into consideration in preparing the Final Staff Assessment (FSA).

ENVIRONMENTAL JUSTICE

Executive Order 12898, "Federal Actions to address Environmental Justice in Minority Populations and Low-Income Populations," focuses federal attention on the environment and human health conditions of minority communities and calls on federal agencies to achieve environmental justice as part of this mission. The order requires the U.S. Environmental Protection Agency (USEPA) and all other federal agencies (as well as state agencies receiving federal funds) to develop strategies to address this issue. The agencies are required to identify and address any disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and/or low-income populations.

For all siting cases, Energy Commission staff conducts an environmental justice screening analysis in accordance with the "Final Guidance for Incorporating Environmental Justice Concerns in USEPA's National Environmental Policy Act (NEPA) Compliance Analysis" dated April 1998. The purpose of the screening analysis is to determine whether a minority or low-income population exists within the potentially affected area of the proposed site.

California Statute, Section 65040.12 (c) of the Government Code, defines "environmental justice" to mean "fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." In light of the progress made by federal environmental agencies on environmental justice, the Energy Commission has examined federal guidelines pursuant to its desire to follow environmental justice principles for the environmental review of this project.

The steps recommended by these guidance documents to assure compliance with the Executive Order are: (1) outreach and involvement; (2) a screening-level analysis to determine the existence of a minority or low-income population; and (3) if warranted, a detailed examination of the distribution of impacts on segments of the population. Though the Federal Executive Order and guidance are not binding on the Energy Commission, staff finds these recommendations helpful for implementing this environmental justice analysis. Staff has followed each of the above steps for the following 11 sections in the PSA: Air Quality, Hazardous Materials, Land Use, Noise, Public Health, Socioeconomics, Soils and Water, Traffic and Transportation, Transmission Line Safety/Nuisance, Visual Resources, and Waste Management.

The purpose of the environmental justice screening analysis is to determine whether a low-income and/or minority population exists within the potentially affected area of the proposed site. Staff conducted the screening analysis in accordance with the "Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analysis" (Guidance Document) dated April 1998. People of color populations, as defined by this Guidance Document, are identified where either:

- the minority population of the affected area is greater than fifty percent of the affected area's general population; or
- the minority population percentage of the area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.

The EPA requires local air districts to perform an environmental justice analysis for Prevention of Significant Deterioration permits, where such permits are required by federal law. As the lead agency for reviewing applications to build new thermal electric generation facilities greater than 50 megawatts, the Energy Commission performs an environmental justice analysis in part to assist the local air districts.

A greater than 50 percent minority and low-income population has been identified within a one-mile radius of the SFERP. However, staff did not identify any significant direct or cumulative, adverse impacts in any of the 11 sections of the PSA evaluated for environmental justice screening. Therefore, the construction and operation of the SFERP project is not considered to have a disproportional impact on an environmental justice population. However, staff has worked closely with the CCSF to identify local mitigation measures designed to reduce to the greatest extent possible any impact that will occur in the communities surrounding the proposed project.

OUTREACH

The Energy Commission's outreach program is primarily facilitated by the Public Advisers Office (PAO). This is an ongoing process that to date has involved the following efforts:

Libraries:

- On March 29, 2004, the PAO sent the original SFERP AFC to the San Francisco Public Library; including the Larkin Street Main Library; the Potrero Branch Library and the Bayview Branch Library.

- On April 4, 2005, the PAO sent the SFERP Supplement A AFC to these same San Francisco Public Libraries.

Initial Outreach Efforts:

- Energy Commission staff met with CCSF staff members.
- The PAO prepared informational poster for local distribution.
- The PAO sent notices to homeowners/residents/businesses within proximity to the proposed SFERP.
- A flyer describing the project was distributed to all San Francisco City and County elected officials and all sensitive receptors (hospitals, schools, daycare centers, convalescent facilities) located within a three-mile radius of the proposed SFERP.
- Flyers were distributed to all local schools (four elementary) within a three-mile radius of the proposed SFERP.
- Flyers were distributed to local businesses.
- On June 9, 2004, staff met informally with representatives of Greenaction for Health and Environmental Justice (Greenaction), Communities for a Better Environment (CBE), the Potrero Boosters Neighborhood Association and the Dogpatch Neighborhood Association
- On June 16, 2004, staff met informally with representatives of Californians for Renewable Energy (CARE).
- On July 19, 2004, staff met informally with representatives of the Bayview Hunters Point Neighborhood Association.

Preparation for Information Hearing/Site Visit on June 15, 2004 and May 6, 2005:

- Eleven thousand flyer-inserts circulated by the San Francisco Examiner's The Independent Newspaper on June 8 and again on June 12, 2004.
- A mass e-mail for Supplement A Informational Hearing/Site Visit flyer (similar to that distributed in 2004) was sent by the PAO to over 200 individuals and organizations. Additionally, notification was circulated in The Independent newspaper and sent to primary lead organizations representing the community (including Greenaction, Dogpatch Homeowners Association, Potrero Homeowners Association, Hunters/Bay View Homeowners Association, Potrero Business Association, CBE and the California Center for Environmental Health).

Preparation for Data Response/Issue Resolution Workshop, July 19, 2004 and May 6, 2005:

- For the 2004 Data Response/Issue Resolution Workshop, the PAO sent 25 letters and 120 emails to sensitive receptors, local residents and community leaders in the Potrero Hills/Hunters Point area of southeast San Francisco to inform them of the July 19th workshop for the SFERP, held at the Potrero Hill Neighborhood House in San Francisco.

- For the 2005 Data Response/Issue Resolution Workshop, staff sent a mass e-mail for Supplement A, flyers were sent by the PAO to over 200 individuals and organizations. Additionally, notification was circulated in The Independent newspaper, and sent to primary lead organizations representing the community (including Greenaction, Dogpatch Homeowners Association, Potrero Homeowners Association, Hunters/Bay View Homeowners Association, Potrero Business Association, CBE and the California Center for Environmental Health).

Energy Commission regulations require staff to notice, at a minimum, property owners within 1,000 feet of a project and 500 feet of a linear facility (such as transmission lines, gas lines and water lines). This was done for the SFERP. In addition, staff used a private company to prepare a mailing notification of residences and businesses within one mile of the original Potrero site. Staff also prepared a notification list of the region's organizations based on information received from the CCSF and another notification list including the names of interested parties from the former Mirant project.

STAFF'S ASSESSMENT

Each technical area section of the PSA contains a discussion of the project setting, impacts, and where appropriate, mitigation measures and conditions of certification. The PSA includes staff's assessment of:

- the environmental setting of the proposal;
- impacts on public health and safety, and measures proposed to mitigate these impacts;
- environmental impacts, and measures proposed to mitigate these impacts;
- the engineering design of the proposed facility, and engineering measures proposed to ensure the project can be constructed and operated safely and reliably;
- project closure;
- project alternatives;
- compliance of the project with all applicable laws, ordinances, regulations and standards (LORS) during construction and operation;
- environmental justice for minority and low income populations; and
- proposed conditions of certification.

Staff has prepared its preliminary analyses and has made preliminary recommendations for most technical areas, while in two technical areas (Cultural Resources and Soil and Water Resources), staff was unable to make recommendations due to incomplete information.

SUMMARY OF PROJECT RELATED IMPACTS

Staff believes that as currently proposed, including the applicant's and the staff's proposed mitigation measures and the staff's proposed conditions of certification, the SFERP will comply with all applicable laws, ordinances, regulations, and standards

(LORS), and that significant adverse direct, indirect, and cumulative impacts will not occur. Only two of the technical areas noted below are inconclusive due to the need for complete data responses. For a more detailed review of potential impacts, see staff's technical analyses in the PSA. The status of each technical area is summarized in the table below. The discussion following the table identifies the items necessary for completion of the PSA and provides a discussion of associated issues.

Technical Area	Complies with LORS	Impacts Mitigated
Air Quality	Yes	Yes
Biological Resources	Yes	Yes
Cultural Resources	Incomplete	Incomplete
Efficiency	Yes	Yes
Facility Design	Yes	Yes
Geology & Paleontology	Yes	Yes
Hazardous Materials	Yes	Yes
Land Use	Yes	Yes
Noise	Yes	Yes
Public Health	Yes	Yes
Reliability	Yes	Yes
Socioeconomic Resources	Yes	Yes
Soil & Water Resources	Incomplete	Incomplete
Traffic & Transportation	Yes	Yes
Transmission Line Safety/Nuisance	Yes	Yes
Transmission System Engineering	Yes	Yes
Visual Resources	Yes	Yes
Waste Management	Yes	Yes
Worker Safety and Fire Protection	Yes	Yes

CULTURAL RESOURCES

Staff's analysis demonstrates that SFERP will have no impact on significant historic standing structures, historic districts, or ethnographic resources. Final assessment of potential impacts to archaeological resources will be completed when the applicant provides two reports on the archaeological survey of portions of the impact area, projected for September 14, 2005 (Carrier 2005). When the reports are received and the cultural resources inventory is complete, the analysis of SFERP's potential impacts to archaeological resources will be completed and mitigation measures proposed for any impacts that are potentially significant.

SOIL AND WATER RESOURCES

With the information provided to date, staff has determined the proposed project would result in a less than significant impact to soil and water resources. The SFERP would comply with all applicable soil and water resource LORS, and potentially significant impacts would be mitigated through the preparation of various construction and operating plans that would detect and correct any problems relating to soil erosion,

contamination to surface and groundwater, use of potable water supplies, or non-compliance with wastewater treatment and discharge requirements. However, staff still needs complete information on soil contamination and on the use of vegetated swales prior to the release of the Final Staff Analysis (FSA). The applicant plans to perform soil and groundwater sampling during September 2005 and will provide the results prior to the FSA.

ALTERNATIVES SUMMARY

In the analysis of individual resource areas, the PSA finds potential adverse impacts of the proposed SFERP on air quality, cultural resources, hazardous materials management, land use, noise, and public health. Based on these and other concerns, the Alternatives section evaluated six alternatives in detail. An additional 24 alternatives were considered but eliminated from detailed analysis. The alternatives analyzed in detail include three site alternatives (involving construction of the three turbines in a different location) at Brisbane, San Francisco International Airport (SFIA), and East Bay alternative sites, two project alternatives (the Trans Bay Cable Project and the Potrero Power Plant Unit 7 Project), and the No Project Alternative.

Among the project alternatives analyzed, the alternative considering construction of Potrero Power Plant Unit 7 has the potential for greatest impacts. Of the alternative sites evaluated, the Brisbane Alternative has the potential for greatest impacts and would have greater impacts in comparison with the proposed SFERP in the issue areas of noise, land use, traffic, visual resources, and water and soils, as well as concerns relating to transmission system engineering and transmission safety and nuisance.

The Trans Bay Cable Project and the Brisbane, San Francisco International Airport (SFIA), and East Bay Alternatives would fail to meet a major project objective: closing aging in-City generation, i.e., releasing Potrero Units 3 through 6 from applicable Reliability Must Run (RMR) contracts. Because these alternatives would not result in generation within the City and County of San Francisco (CCSF), they would not meet California Independent System Operator (Cal ISO) requirements for generation to be "north of Martin Substation." The Trans Bay Cable Project would likely have the least environmental impacts overall (primarily because, as a transmission project, its operational impacts would be minor), but construction of this project would result in greater impacts than the proposed project to aquatic biological resources, water and soil, traffic, geological resources, and transmission line safety and nuisance impacts. However, without the ability to cause closure of in-City generation facilities, the overall impacts of the Trans Bay Cable Project would be greater than those of the SFERP.

Staff also believes that, overall, the No Project Alternative is not superior to the proposed project. This scenario would likely delay the closure of the Potrero Power Plant Units 3 through 6, which are objectives of the proposed SFERP and are older plants with have relatively higher air emissions. The No Project Alternative would also result in reduced reliability for San Francisco's electrical supply.

NOTEWORTHY PUBLIC BENEFITS

AIR QUALITY

The City plans to operate local monitoring stations prior to SFERP operation that would collect information on air quality and provide a basis to address community concems related to the possible need for further mitigation measures. One of these monitoring stations is located in Whitney Young Circle at Hudson and Progress streets and has already began collecting data on criteria and toxic air pollutants in the Hunters Point community (the station is planned to operate for approximately 12 months). Two other monitoring stations are planed to be located in the Potrero Hills and Dogpatch Neighborhoods. Data collected from these local stations would be compared with data collected from the BAAQMD Arkansas Street monitoring station to determine if there are any significant local variations in air quality. Depending on the data obtained from these stations, the City may continue to monitor the air quality in the southeast part of the City after SFERP start-up.

In addition to the above, it is noteworthy that one of the important project objectives of SFERP is to enable shutdown of the existing in-city generation, including Hunters Point Units 1 and 4. The City has been in discussion with the Cal ISO regarding the prerequisites to such a shutdown and the factors involved in terminating the RMR contracts for the Mirant Potrero generation facility. This process is still evolving, but it appears increasingly likely that the Hunters Point Units will shut down as a result of these efforts in the approximate time frame that SFERP comes on-line. The air emissions from Hunters Point units have been a community health concern for many years. The final closure of these units will constitute a benefit to the surrounding community and the air basin by removing this concern.

POWER PLANT RELIABILITY

The applicant proposes that one of the primary justifications for the SFERP is that it will improve reliability in San Francisco and the peninsula. This will be accomplished by replacing old unreliable units with a new highly reliable technology. The fact that the project consists of three combustion turbine generators configured as independent equipment trains provides inherent reliability. A single equipment failure cannot disable more than one train, thus allowing the plant to continue to generate (at reduced output).

TRANSMISSION SYSTEM ENGINEERING/LOCAL SYSTEM EFFECTS

A summary of the Transmission System Engineering/Local System Effects of the SFERP includes the following:

1. The SFERP will reduce transmission system losses. Over 20 years, the savings to ratepayers have a present value at between $18 million and $27 million. As well as reducing the cost of producing power in California, these loss reductions would also contribute to a related decrease in the use of fossil fuels, water, and the production of air emissions by reducing the need for additional generation resources.
2. A primary benefit of the addition of the SFERP is that the old and unreliable Potrero turbines (units 4, 5 and 6) could be released from their Reliability Must Run (RMR) contracts and retired.

3. The SFERP can be reliably connected to the CA ISO controlled grid with the projects identified in the current transmission plan and no "downstream" new or modified facilities are required to accommodate interconnection of the project.
4. The SFERP would increase reactive margin in San Francisco and thus improve system reliability and help to maintain sufficient voltage in the area.

WATER QUALITY

The use of raw sewage will slightly decrease the volume of wastewater treated by the Southeast Water Pollution Control Plant and reduce the quantity of secondary wastewater discharged to San Francisco Bay. The use of recycled water for plant processes reduces the need for other freshwater sources to be used for this project and maintains reliability of local water supplies. Chapter 7.5 of the California Water Code, the Water Recycling Act of 1991, sets a statewide water recycling goal to recycle a total of one million acre-feet of water per year by the year 2010. The SFERP site will use over 500 acre-feet of recycled water each year in support of the 2010 goal.

RECOMMENDATIONS AND SCHEDULE

Commission staff has concluded that if all mitigation measures and recommended conditions of certifications are adopted by the Commission and implemented by the applicant, all applicable laws, ordinances, regulations and standards will be complied with and no significant adverse environmental impacts will result from the SFERP. Staff also concludes that there will not be a disproportionately high and adverse human health or environmental effect on a minority and/or low-income population. Staff is assuming that the Cultural resources and Soil and Water Resources information will support its tentative conclusion that the project will not result in significant impacts. With this caveat, staff recommends certification of the SFERP subject to all conditions of certification as proposed in this PSA.

The project is being reviewed under the 12-month AFC process. Staff anticipates the receipt of the outstanding Cultural Resources and Soil and Water Resources information and receipt of a timely Final Determination of Compliance from the Bay Area Air Quality Management District. Having these items will permit the completion of the Final Staff Assessment and the beginning of evidentiary hearings.

INTRODUCTION

William Pfanner

PURPOSE OF THIS REPORT

This Preliminary Staff Assessment (PSA) is the Energy Commission staff's independent analysis of the San Francisco Electric Reliability Project, Amendment A (hereto referred to as the SFERP). This PSA is a staff document. It is neither a Committee document, nor a draft decision. The PSA describes the following:

- the proposed project;
- the existing environment;
- whether the facilities can be constructed and operated safely and reliably in accordance with applicable laws, ordinances, regulations and standards (LORS);
- the environmental consequences of the project including potential public health and safety impacts;
- cumulative analysis of the potential impacts of the project, along with potential impacts from other existing and known planned developments;
- mitigation measures proposed by the applicant, staff, interested agencies, local organizations and intervenors which may lessen or eliminate potential impacts;
- the proposed conditions under which the project should be constructed and operated, if it is certified; and
- project alternatives.

The analyses contained in this PSA are based upon information from the: 1) AFC Supplement A, 2) responses to data requests, 3) supplementary information from local and state agencies, interested organizations and individuals, 4) existing documents and publications, 5) independent field studies and research, and 6) comments at workshops. The analyses for most technical areas include discussions of proposed conditions of certification. Each proposed condition of certification is followed by a proposed means of "verification." The PSA presents conclusions and proposed conditions that apply to the design, construction, operation and closure of the proposed facility.

The Energy Commission staff's analyses were prepared in accordance with Public Resources Code section 25500 et seq. and Title 20, California Code of Regulation section 1701 et seq., and the California Environmental Quality Act (CEQA) (Pub. Resources Code, §21000 et seq.)

ORGANIZATION OF THE PRELIMINARY STAFF ASSESSMENT

The PSA contains an Executive Summary, Introduction, Project Description, and Project Alternatives. The environmental, engineering, and public health and safety analysis of the proposed project is contained in a discussion of 19 technical areas. Each technical area is addressed in a separate chapter. They include the following: air quality, public health, worker safety and fire protection, transmission line safety,

hazardous material management, waste management, land use, traffic and transportation, noise, visual resources, cultural resources, socioeconomics, biological resources, soil and water resources, geological and paleontological resources, facility design, power plant reliability, power plant efficiency, and transmission system engineering. These chapters are followed by a discussion of facility closure, project construction and operation compliance monitoring plans, and a list of staff that assisted in preparing this report.

Each of the 19 technical area assessments includes a discussion of:

- laws, ordinances, regulations and standards (LORS);
- the regional and site-specific setting;
- project specific and cumulative impacts;
- mitigation measures;
- closure requirements;
- conclusions and recommendations; and
- conditions of certification for both construction and operation (if applicable).

ENERGY COMMISSION SITING PROCESS

The California Energy Commission has the exclusive authority to certify the construction, modification and operation of thermal electric power plants 50 megawatts (MW) or larger. The Energy Commission certification is in lieu of any permit required by state, regional, or local agencies, and federal agencies to the extent permitted by federal law (Pub. Resources Code, §25500). The Energy Commission must review power plant AFCs to assess potential environmental impacts including potential impacts to public health and safety, potential measures to mitigate those impacts [Pub. Resources Code, §25519), and compliance with applicable governmental laws or standards (Pub. Resources Code, §25523 (d)].

The Energy Commission's siting regulations require staff to independently review the AFC and assess whether the list of environmental impacts contained is complete, and whether additional or more effective mitigation measures are necessary, feasible and available [Cal. Code Regs., tit. 20, §§1742 and 1742.5(a)]. Staff's independent review shall be presented in a report (Cal. Code Regs., tit. 20 , §1742.5). The Final Staff Assessment (FSA) is that report.

In addition, staff must assess the completeness and adequacy of the health and safety standards, and the reliability of power plant operations [Cal. Code Regs., tit. 20, §1743(b)]. Staff is required to develop a compliance plan (coordinated with other agencies) to ensure that applicable laws, ordinances, regulations and standards are met [Cal. Code Regs., tit. 20, §1744(b)].

Staff conducts its environmental analysis in accordance with the requirements of the California Environmental Quality Act (CEQA). No additional Environmental Impact Report (EIR) is required because the Energy Commission's site certification program

has been certified by the Resources Agency as meeting all requirements of a certified regulatory program [Pub. Resources Code, §21080.5 and Cal. Code Regs., tit. 14, §15251 (k)]. The Energy Commission acts in the role of the CEQA lead agency and is subject to all other applicable portions of CEAQ.

The staff prepares a PSA and presents for the applicant, intervenors, organizations, agencies, other interested parties and members of the public, the staff's analysis, conclusions, and recommendations. Where it is appropriate, the PSA incorporates comments received from agencies, the public and parties to the siting case, and comments made at the workshops.

Staff will provide a comment period to resolve issues between the parties and to narrow the scope of adjudicated issues in the evidentiary hearings. During the period after the publishing of the PSA, staff will conduct workshops to discuss its findings, proposed mitigation, and proposed compliance-monitoring requirements. Based on the workshops and written comments, staff may refine its analysis, correct errors, and finalize conditions of certification to reflect areas where agreements have been reached with the parties, and publish a FSA.

The FSA is only one piece of evidence that will be considered by the Committee (two Commissioners who have been assigned to this project) in reaching a decision on whether or not to recommend that the full Energy Commission approve the proposed project. At the public hearings, all parties will be afforded an opportunity to present evidence and to rebut the testimony of other parties, thereby creating a hearing record on which a decision on the project can be based. The hearing before the Committee also allows all parties to argue their positions on disputed matters, if any, and it provides a forum for the Committee to receive comments from the public and other governmental agencies.

Following the hearings, the Committee's recommendation to the full Energy Commission on whether or not to approve the proposed project will be contained in a document entitled the Presiding Members' Proposed Decision (PMPD). Following publication, the PMPD is circulated in order to receive written public comments. At the conclusion of the comment period, the Committee may prepare a revised PMPD. At the close of the comment period for the revised PMPD, the PMPD is submitted to the full Energy Commission for a decision. Within 30 days of the Energy Commission decision, any party may appeal the decision to the Energy Commission.

PUBLIC AND AGENCY COORDINATION

Publicly noticed workshops have been held in San Francisco. Topics discussed include: Air Quality, Project Alternatives, Cultural Resources, Land Use, Noise, Soil and Water Resources, Traffic and Transportation, Transmission System Engineering, Visual Resources, Waste Management, Hazardous Materials Management, and Public Health

In addition to these workshops, extensive coordination has occurred with the numerous local, state and federal agencies that have an interest in the project. Particularly, Energy Commission staff has worked with the City and County of San Francisco, intervenors,

community groups, and individual members of the public of the community. On June 9, 2004, staff met informally with representatives of Greenaction for Health and Environmental Justice (Greenaction), Communities for a Better Environment (CBE), the Potrero Boosters Neighborhood Association and the Dogpatch Neighborhood Association to discuss their organizations' key concerns regarding the proposed SFERP. On June 16, staff met with representatives of Californians for Renewable Energy (CARE) and on July 19, staff conducted a similar meeting with representatives of the Bayview Hunters Point Neighborhood Association.

PROJECT DESCRIPTION

William Pfanner

INTRODUCTION

On March 18, 2004, the City and County of San Francisco (CCSF) submitted an Application for Certification (AFC) to the Energy Commission to construct and operate a simple cycle power plant, referred to as the San Francisco Electric Reliability Project (SFERP). The project was initially to be located at the former Potrero power plant site owned by Mirant Corporation. However, an amendment to the project application, Supplement A, was filed by CCSF on March 25, 2005, relocating the proposed project to a site approximately 1/4 mile to the south of the original Mirant project site. The new location is a 4-acre parcel owned by CCSF located south of 25th Street and approximately 900 feet east of Illinois Street.

SAN FRANCISCO ELECTRIC RELIABILITY PROJECT

LOCATION

The SFERP Supplement A (here to referred to as SFERP) will consist of a nominal 145-megawatt (MW) simple-cycle plant, using three natural gas-fired General Electric LM 6000 gas turbines and associated infrastructure. The project site is located near the San Francisco Bay in the Potrero District of Southeast San Francisco (**Figure – 1, Vicinity Map)**, and is adjacent to the planned MUNI Metro East Light Rail Vehicle Maintenance and Operations Facility **(Figure 2 – Site Location Map)**.

PROJECT CONSTRUCTION AND FACILITY OPERATION

Construction of the SFERP, from site preparation and grading to commercial operation, is expected to take approximately 12 months with commercial operation anticipated to begin in mid 2007. The CCSF intends to operate the facility 24 hours per day, 7 days per week, for up to 12,000 hours per year total for the three combustion turbines.

PROJECT EQUIPMENT AND LINEAR FACILITIES

Thermal energy will be produced in the three combustion turbine generators (CTGs) through the combustion of natural gas, which will be converted into the mechanical energy required to drive the combustion turbine compressors and electric generators. Three aeroderivative CTGs have been selected for the project. General Electric will supply these CTGs. The aeroderivative technology is the most efficient simple-cycle CTG on the market and has a documented availability record of 97.8 percent. Each CTG system will consist of a CTG with supporting systems and associated auxiliary equipment. The CTGs will have water injection for controlling oxides of nitrogen (NOx) emissions and for power augmentation; CTG exhaust emissions will be further reduced through the use of selective catalytic reduction (SCR) and oxidation catalyst systems.

The CTGs will be equipped with the following required accessories to provide safe and reliable operation:

- Inlet air chilling
- Inlet air filters
- Metal acoustical enclosure
- Lube oil cooler
- Water injection system
- Turbine enclosure vent fans
- Generator enclosure vent fans
- Fire detection and protection system

Site Plan and Access

The site arrangement shown in **Figure - 3** and the typical elevation views presented in **Figure - 4** illustrate the location and size of the proposed facility. Access to the facility will be via a 20 foot wide plant access roadway located on the west side of the project site off of 25th street. Approximately 4 fenced acres will be required to accommodate the generation facilities. The construction laydown area will be approximately 8.5 acres located on land leased from the Port of San Francisco. The laydown area is located directly east and adjacent to the project site between the project site and the waterfront. Currently, there are some temporary facilities on the project site including construction trailers, a construction laydown area and a cement batch plant. The temporary facilities will be removed prior to the construction of the SFERP.

Fuel

A pipeline tie-in will be made to the existing PG&E natural gas transmission line at the intersection of Illinois and 25th streets. Natural gas for the facility will be delivered through a new 900-foot-long, 12-inch-diameter (or less) pipeline. This service will be connected to a booster compressor station that will be part of the SFERP facility.

Water

The City will provide wastewater effluent which will be treated at the power plant site and used for the facility's process water needs. The water pump station will be located in an existing combined sewer system structure and will include three variable frequency drive pumps (two operational and one standby). A 0.7-mile long pipeline will connect the water pump station and the SFERP's onsite recycled water treatment system. The wastewater pipeline will consist of two sections. Approximately 1,300 feet of the pipeline will be installed within an existing collection box. The remaining section will be new construction. The onsite treatment system will be designed to produce Title 22 quality recycled water for industrial use at the SFERP. Potable water for drinking and other administrative building needs will be supplied by the San Francisco Public Utilities Commission (SFPUC).

Wastewater Discharge

Wastewater from the water treatment process, cooling/process water blowdown, and sanitary sewer discharges will be sent to the City of San Francisco Southeast Wastewater Treatment Plant (SEWPCP) via the combined sewer system. The interconnection to the combined sewer system will be located in Cesar Chavez Street, on the south side of the project site.

Electricity Transmission and Distribution

The project will include the construction of a new air-insulated 115-kilovolt (kV) electric transmission line switchyard on the north side of the site adjacent to 25th Street. Pacific Gas & Electric (PG&E) is currently performing a Facilities Study to evaluate whether the SFERP circuits will enter the switchyard underground from Illinois Street or continue underground north to 22nd Street. The circuits would then run east beneath 22nd Street to an underground/overhead transition structure located on the eastern portion of the Potrero switchyard. This overhead line would then connect with the switchyard bus in an overhead arrangement. Electrical generation will be at 13.8 kV, which will be stepped up with 115-kV step-up transformers.

AIR POLLUTION EMMISSIONS

The plant's design will incorporate air pollution emission controls designed to meet the best available technology stringent standards required by the State and the Bay Area Air Quality Management District (BAAQMD). These controls will include water injection for combustion control of nitrogen emissions, a selective catalytic reduction system (SCR) for post combustion control oxides of nitrogen emissions, and an oxidation catalyst system to control carbon monoxide and precursor organic compound emissions.

MANAGEMENT OF HAZARDOUS MATERIALS

There will be a variety of chemicals stored and used during construction and operation of SFERP. The storage, handling, and use of all chemicals will be conducted in accordance with applicable laws, ordinances, regulations, and standards (LORS). Chemicals will be stored in appropriate chemical storage facilities, bulk chemicals will be stored in storage tanks, and most other chemicals will be stored in returnable delivery containers. Chemical storage and chemical feed areas will be designed to contain leaks and spills. Berm and drain piping design will allow a full-tank capacity spill without overflowing the berms. For multiple tanks located within the same bermed area, the capacity of the largest single tank will determine the volume of the bermed area and drain piping. Drain piping for volatile chemicals will be trapped and isolated from other drains to eliminate noxious or toxic vapors. After neutralization, if required, water collected from the chemical storage areas will be directed to the cooling tower basin.

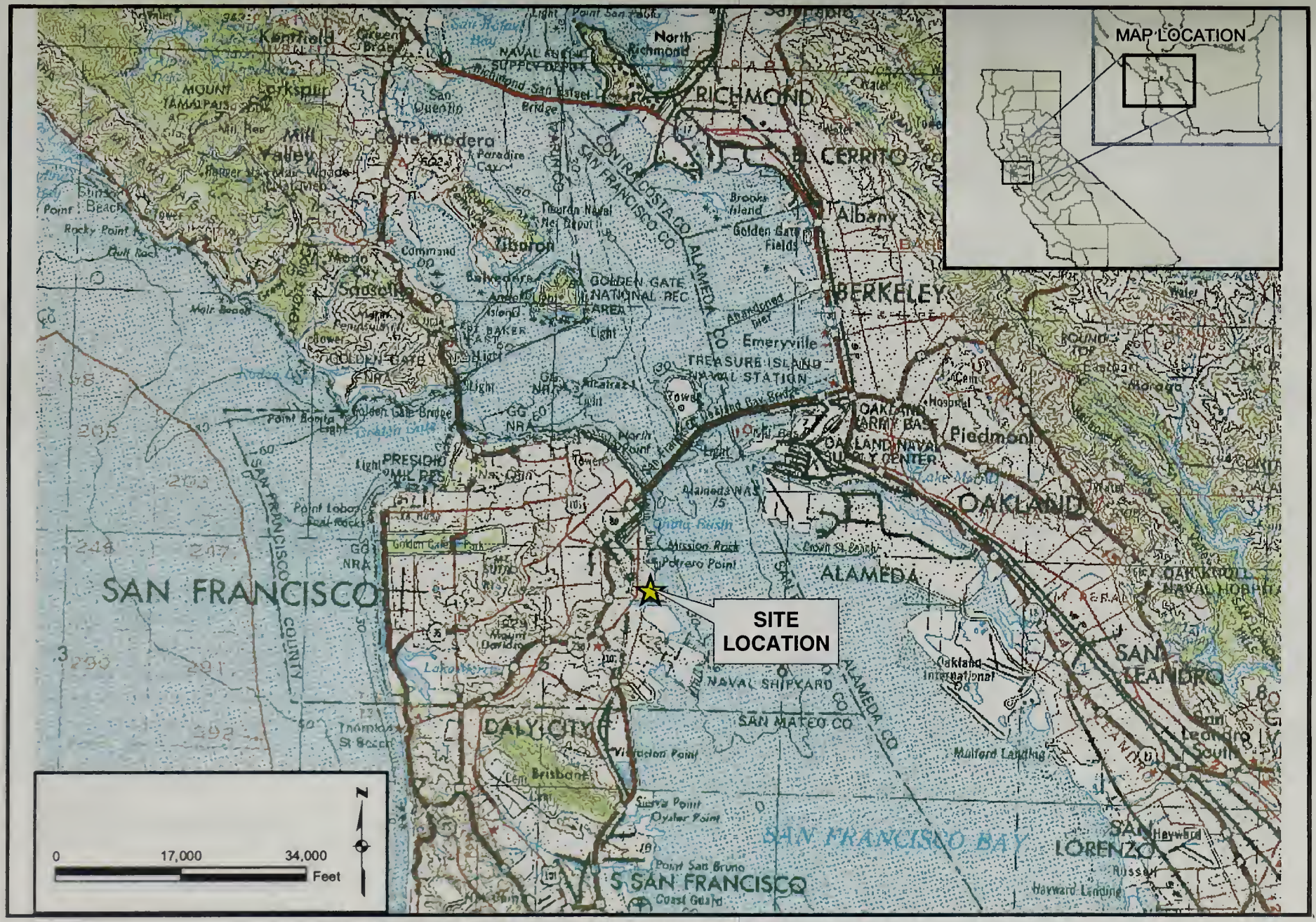
A 29 percent solution of aqueous ammonia will be stored in a tank with a containment basin and collection sump. Portable safety showers and eyewashes will be provided adjacent to the ammonia storage tank area. Maintenance personnel will use state-approved, personal protective equipment (PPE) during chemical spill containment and cleanup activities. Personnel will be properly trained in the handling of these chemicals.

Visual and audible alarms will alert SFERP personnel and personnel at the adjacent MUNI facility in the event of an ammonia spill. Training will also be provided to SFERP personnel and personnel at the adjacent MUNI facility on the procedures to follow in case of a chemical spill or accidental release. Adequate supplies of absorbent material will be stored onsite for spill cleanup. Electric equipment insulating materials will be specified to be free of PCBs.

FIGURE 1-3

PROJECTION DESCRIPTION - FIGURE 1

San Francisco Electric Reliability Project - Supplement A - Vicinity Map

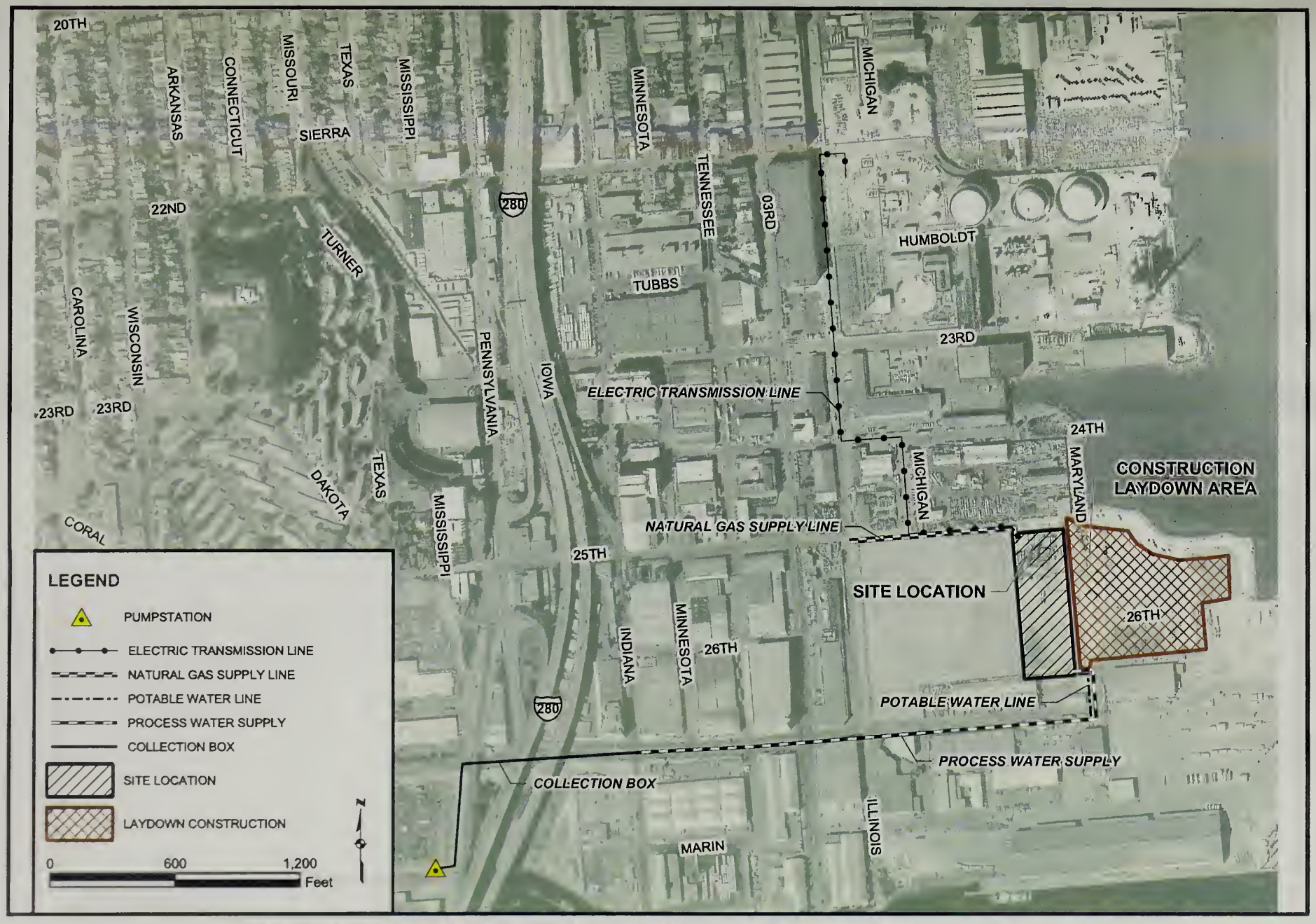


CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: AFC Supplement A, Figure 1-1

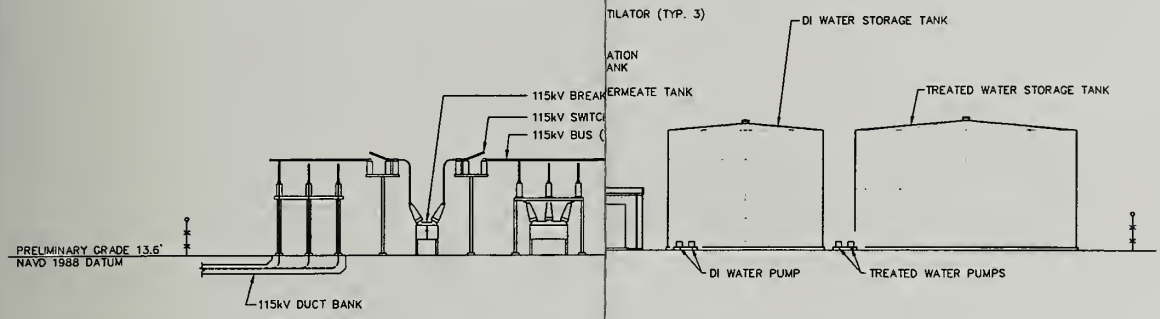
PROJECTION DESCRIPTION - FIGURE 2

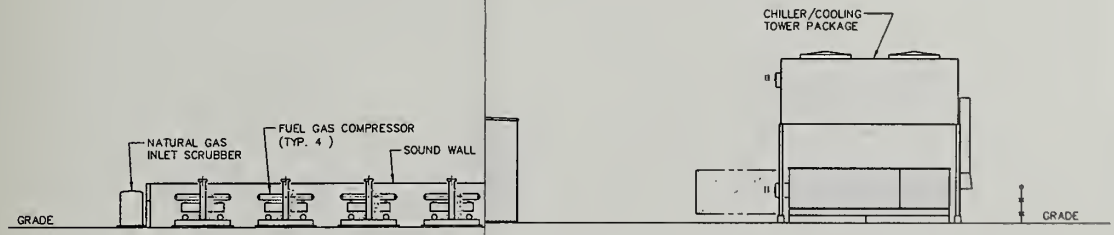
San Francisco Electric Reliability Project - Supplement A - Site and Linear Facilities Location



CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: AFC Supplement A, Figure 2-1



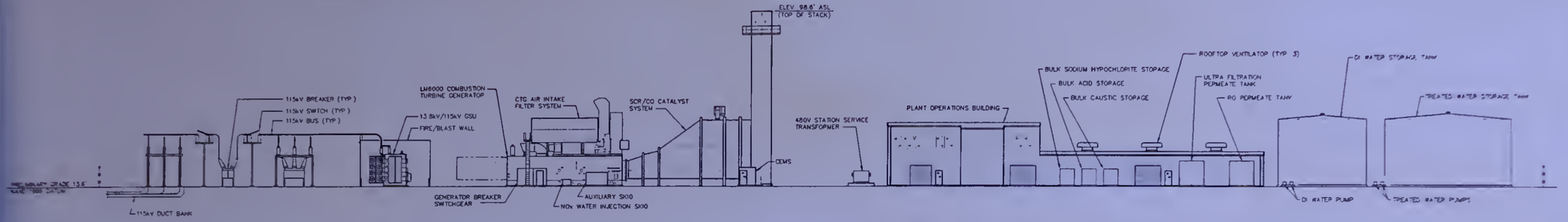


ELEVATION D
SCALE: 1"=20'-0" G8.1 G8.2

PRELIMINARY

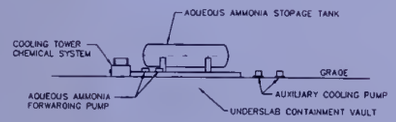
PROJECTION DESCRIPTION - FIGURE 3

San Francisco Electric Reliability Project -Supplement A- Plant Elevation

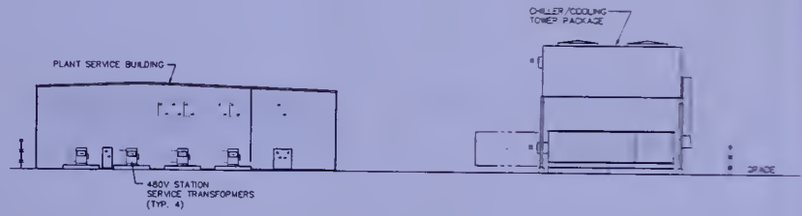


ELEVATION A (G8.1 | G8.2)
SCALE 1"=20'-0"

ELEVATION B (G8.1 | G8.2)
SCALE 1"=20'-0"



ELEVATION C (G8.1 | G8.2)
SCALE 1"=20'-0"



ELEVATION D (G8.1 | G8.2)
SCALE 1"=20'-0"

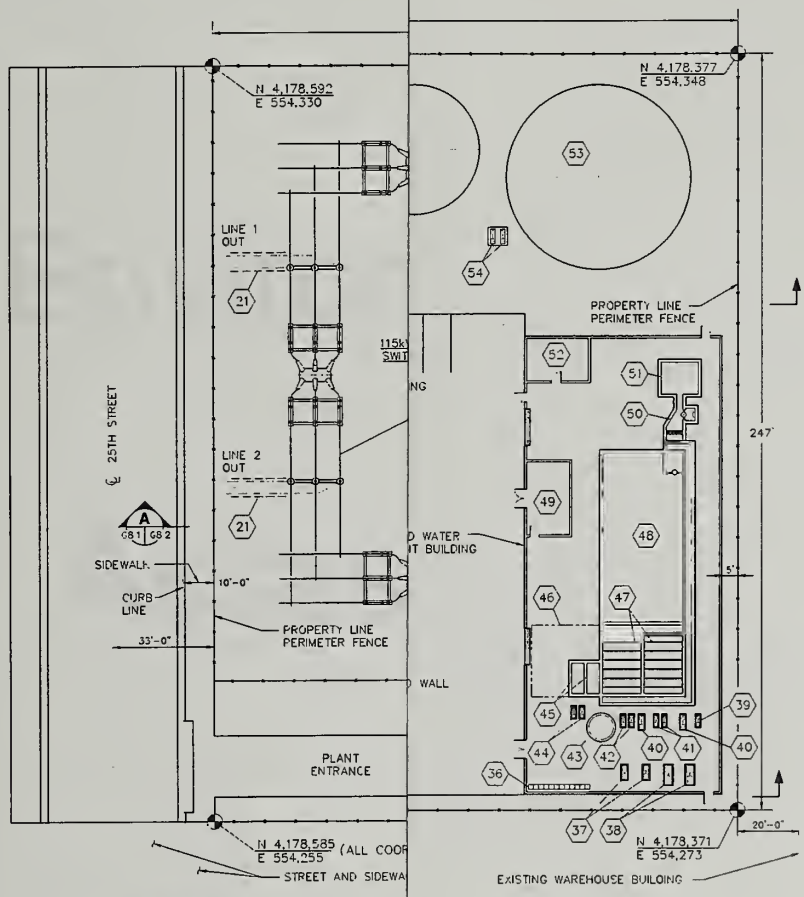
PRELIMINARY

PROJECT DESCRIPTION

SEPTEMBER 2005

CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: AFC Supplement A, Figure 2-3



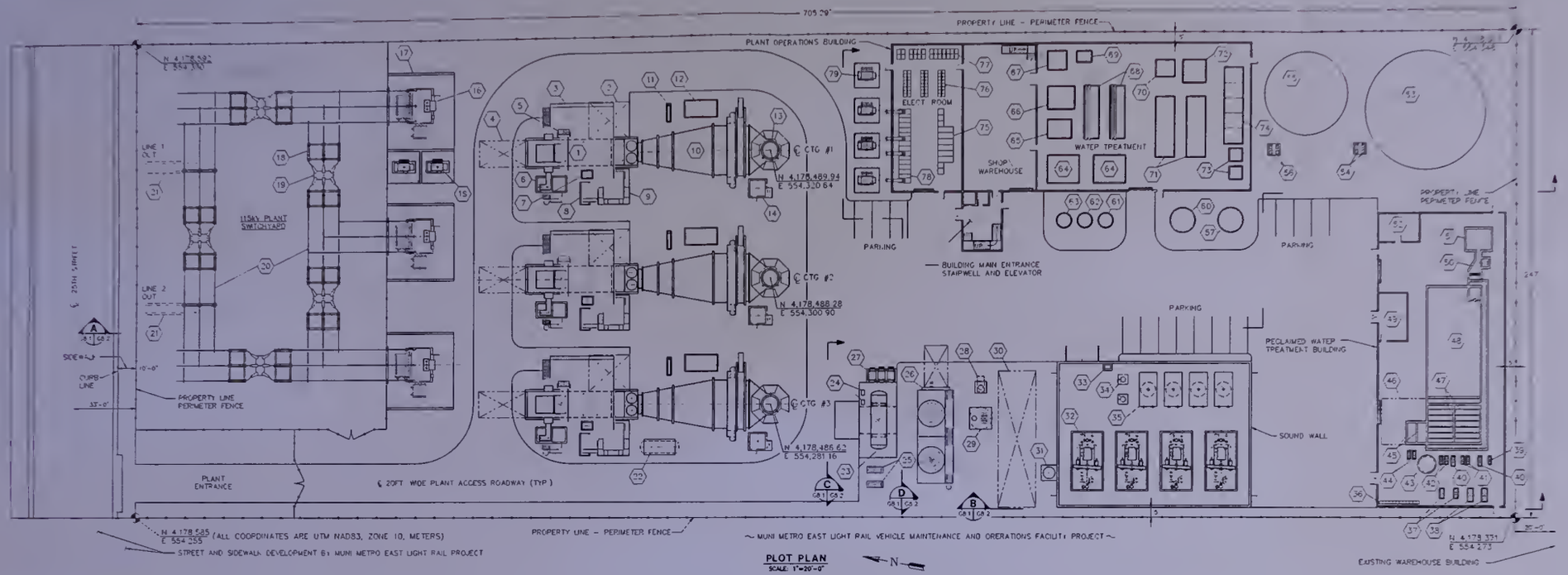
LEGEND:

TYPICAL FOR THREE UNITS

1. LM6000 COMBUSTION TURBINE GENERA
2. TURBINE REMOVAL/MAINTENANCE ARE
3. CTG AIR INTAKE FILTER SYSTEM
4. GENERATOR ROTOR REMOVAL AREA
5. CTG FIRE PROTECTION SKID
6. GENERATOR BREAKER SWITCHGEAR
7. SPRINT SYSTEM SKID
8. NOx WATER INJECTION SKID
9. AUXILIARY SKID
10. SCR/CO CATALYST SYSTEM
11. AMMONIA FLOW BALANCE SKID
12. AMMONIA VAPORIZATION SKID
13. STACK
14. CEMS
15. 5KV AUXILIARY TRANSFORMER (TYP. 2
16. 13.8kV/115KV GSU (TYP. 3)
17. FIRE/BLAST WALL (TYP.)
18. 115kV SWITCH (TYP. 10)
19. 115 kV BREAKER (TYP.5)
20. SWITCHYARD BUS WORK
21. 115kV DUCT BANK
22. TURBINE WASH WATER ORAIN TANK (
23. AQUEOUS AMMONIA STORAGE TANK
24. AQUEOUS AMMONIA FORWAROING PUM
25. AUXILIARY COOLING PUMPS

PRELIMINARY

G	3-1-05	PROPT'Y. PERIMETER FEATURES ADDED
F	1-24-05	COORD. SYSTEM ADJUSTED
E	1-21-05	STACK COORD. CHANGED TO METERS
D	1-21-05	NAD83 COORDINATES ADDED AND ITEMS 58 & 59 DELETED
C	1-6-05	MUNI UNDEVELOPED SITE
B	11-4-04	2 + 2 ACRE SITE
		PRELIMINARY ISSUE

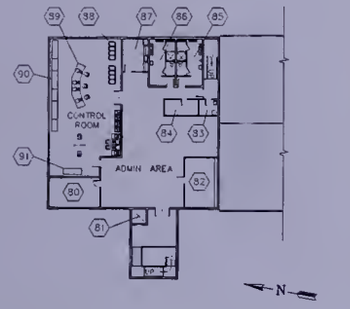


PLOT PLAN
SCALE: 1"=20'-0"

LEGEND:

TYPICAL FOR THREE UNITS

1. LM6000 COMBUSTION TURBINE GENERATOR
2. TURBINE REMOVAL/MAINTENANCE AREA
3. CTG AIR INTAKE FILTER SYSTEM
4. GENERATOR ROTOR REMOVAL AREA
5. CTG FIRE PROTECTION SKID
6. GENERATOR BREAKER SWITCHGEAR
7. SPRINT SYSTEM SKID
8. NOx WATER INJECTION SKID
9. AUXILIARY SKID
10. SCR/CO CATALYST SYSTEM
11. AMMONIA FLOW BALANCE SKID
12. AMMONIA VAPORIZATION SKID
13. STACK
14. CEMS
15. 5KV AUXILIARY TRANSFORMER (TYP. 2)
16. 13.8kV/115KV GSU (TYP. 3)
17. FIRE/BLAST WALL (TYP.)
18. 115kV SWITCH (TYP. 10)
19. 115 kV BREAKER (TYP.5)
20. SWITCHYARD BUS WORK
21. 115kV DUCT BANK
22. TURBINE WASH WATER DRAIN TANK (UG)
23. AQUEOUS AMMONIA STORAGE TANK
24. AQUEOUS AMMONIA FORWARDING PUMPS
25. AUXILIARY COOLING PUMPS
26. CHILLER/COOLING TOWER PACKAGE
27. COOLING TOWER CHEMICAL SYSTEM
28. OIL/WATER SEPARATOR (UG)
29. WASTE WATER SUMP AND LIFT STATION
30. NATURAL GAS METERING STATION
31. NATURAL GAS INLET SCRUBBER
32. FUEL GAS COMPRESSOR (TYP. 4)
33. HYDROCARBON DRAIN TANK
34. DISCHARGE FILTER SCRUBBER (TYP. 2)
35. FUEL GAS COOLING RADIATOR (TYP.4)
36. 480V MCC'S
37. SUPPLEMENTAL AERATION BLOWERS
38. MEMBRANE AIR SCOUR BLOWERS
39. DRAIN PUMP
40. PERMEATE PUMP (TYP. 2)
41. MIXED LIQUOR RECIRCULATION PUMPS
42. CIP/BACKPULSE PUMPS
43. CIP/BACKPULSE TANK
44. CIP TANK RECIRC/DRAIN PUMPS
45. CIP TANKS
46. CASSETTE LAYDOWN AREA
47. MEMBRANE TANKS
48. AEROBIC ZONE
49. CHEMICAL FEED/STORAGE ROOM
50. FEED CHANNEL
51. COMBINED INLET SYSTEM
52. OFFICE/CONTROL ROOM
53. TREATED WATER STORAGE TANK
54. TREATED WATER PUMPS
55. DI WATER STORAGE TANK
56. DI WATER PUMPS
57. RO PERMEATE TANK
58. (NOT USED)
59. (NOT USED)
60. ULTRA FILTRATION PERMEATE TANK
61. BULK CAUSTIC STORAGE (IF REQUIRED)
62. BULK ACID STORAGE (IF REQUIRED)
63. BULK SODIUM HYPOCHLORITE STORAGE
64. EDI TRAIN
65. EDI FEED PUMP SKID
66. RO CLEAN IN PLACE SKID
67. RO FEED PUMP SKID
68. RO TRAINS
69. RO CARTRIDGE FILTERS
70. ULTRA FILTRATION SYSTEM WASTE SKID
71. ULTRA FILTRATION SYSTEM TRAINS
72. ULTRA FILTRATION SYSTEM PUMP SKID
73. AIR BLOWERS
74. CHEMICAL METERING SYSTEMS
75. 5kV SWITCHGEAR
76. 480V MCC'S
77. BATTERIES
78. 480V SWITCHGEAR
79. 480V STATION SERVICE TRANSFORMERS (TYP. 4)
80. PRIVATE OFFICE
81. ELEVATOR
82. CONFERENCE/TRAINING ROOM
83. JANITOR'S STORAGE
84. OFFICE SUPPLY STORAGE
85. MEN'S LOCKERS/SHOWER
86. WOMEN'S LOCKERS/SHOWER
87. LUNCH ROOM
88. INPUT/OUTPUT CABINETS
89. HUMAN/MACHINE INTERFACE
90. CTG CONTROL PANELS
91. SWITCHYARD CONTROL PANEL



PLANT OPERATIONS BUILDING - 2ND FLOOR - PLAN
SCALE 1"=20'-0"

PRELIMINARY

G	3-1-05	PROPTY. PERIMETER FEATURES ADDED
F	1-24-05	COORD. SYSTEM ADJUSTED
E	1-21-05	STACK COORD. CHANGED TO METERS
D	1-21-05	NAD83 COORDINATES ADDED AND ITEMS 58 & 59 DELETED
C	1-6-05	MUNI UNDEVELOPED SITE
B	11-4-04	2 + 2 ACRE SITE PRELIMINARY ISSUE

GRAPHIC SCALE
1" = 20'-0"
0 10 20 30 40 50 60

PROJECT DESCRIPTION
SEPTEMBER 2005

Environmental Assessment

AIR QUALITY

Tuan Ngo, P.E.

SUMMARY OF CONCLUSIONS

Staff finds that, with the inclusion of the Conditions of Certification, the proposed project would be in compliance with all applicable laws, ordinances, regulations, and standards and would not result in any significant air quality-related impacts. Staff also finds that:

- The project ozone precursor emissions (oxides of nitrogen and volatile organic compounds) would be mitigated to a level of less than significant by the surrender of emission reduction credits (offsets);
- The project would incorporate Best Available Control Technology in accordance with the Bay Area Air Quality Management District New Source Review requirements;
- The project will not cause new violations of any nitrogen dioxide, sulfur dioxide, or carbon monoxide ambient air quality standards, and therefore, its emission impacts are not significant for those pollutants;
- The project's particulate matter emissions contribution will be mitigated to a level that is less than significant by the implementation of a local street sweeping program; and
- The project's fine particulate matter emission contribution will be mitigated to a level of less than significant by the implementation of the local street sweeping and the woodstove/fireplace replacement or modification programs; or the surrender of sulfur oxide emission reduction credits.

INTRODUCTION

This analysis addresses the potential air quality impacts resulting from criteria air pollutant emissions created by the construction and operation of the San Francisco Electric Reliability Project (SFERP). Criteria air pollutants are those for which a state or federal ambient air quality standard has been established. They include nitrogen dioxide (NO_2), sulfur dioxide (SO_2), carbon monoxide (CO), ozone (O_3) and its precursors: oxides of nitrogen (NO_x) and volatile organic compounds (VOC), particulate matter less than 2.5 microns (PM2.5) and less than 10 microns in diameter (PM10) and their precursors (NO_x, VOC, SO_2), and lead (Pb). Non-criteria air pollutants (those without ambient standards) are addressed in the **Public Health** Section of this document.

In completing this analysis, the Energy Commission staff evaluated the following major points:

- whether the project is likely to conform with applicable Federal, State, and District air quality Laws, Ordinances, Regulations, and Standards (LORS) as required by Title 20, California Code of Regulations, sections 1744(b) and 1748(c);
- whether the project is likely to cause significant air quality impacts, including new violations of ambient air quality standards or contributions to existing violations of those standards, as required by Title 20, California Code of Regulations, sections 1744(b) and 1748(i); and
- whether the mitigation proposed for the project is adequate to lessen potential significant impacts to less than significant levels as required by Title 20, California Code of Regulations, sections 1742.5 and 1742(b).

LAWS, ORDINANCES, REGULATIONS AND STANDARDS

AIR QUALITY Table 1 summarizes the applicable LORS, which are described in further detail below.

AIR QUALITY Table 1
Laws, Ordinances, Regulations, and Standards

Applicable LORS	Description
Federal	New Source Review : Best Available Control Technology (BACT) and Offset requirements
	Title V: Federal permit
	New Source Performance Standard: 75 ppm NO_x and 150 ppm SO_x @15% oxygen (O_2).
State	California Health and Safety Code: Permitting of source needs to be consistent with approved Clean Air Plan
Local	New Source Review: BACT and offsets
	Acid Rain: Requires continuous emission monitoring system
	Particulate Matter and Visible Emissions: Emissions shall not be darker than Ringelmann No. 1 for a continuous three-minutes, and no more than 0.15 grains PM per standard dry cubic foot.
	Nitrogen Oxides from Stationary Gas Turbines. 9 ppm NO_x@15%O_2.

FEDERAL

The federal Clean Air Act requires the proponent of any new major stationary sources of air pollution and any major modifications to major stationary sources to obtain a construction permit before commencing construction. This process is known as New Source Review (NSR). Its requirements differ depending on the attainment status of air contaminants in the area where the major facility is to be located. Prevention of Significant Deterioration (PSD) requirements apply in areas that are in attainment of the national ambient air quality standards. The NSR requirements apply to areas that have not been able to demonstrate

compliance with national ambient air quality standards. It should be noted that the SFERP is exempt from the federal PSD review due to its size and emissions.

Title V of the federal Clean Air Act requires states to implement and administer an operating permit program. Large sources are required to operate in compliance with the Title V requirements promulgated in Title 40, Code of Federal Regulations, Section 70. A Title V permit contains all of the requirements specified in different air quality regulations that affect an individual project.

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed and approved the Bay Area Air Quality Management District's (District) regulations and has delegated to the District the implementation of the federal NSR, and Title V programs. The District implements these programs through its own rules and regulations that are, at a minimum, as stringent as the federal regulations.

The SFERP's gas turbines are also subject to the federal New Source Performance Standards (NSPS). These standards include a NO_x emissions concentration of no more than 75 parts per million (ppm) at 15 percent excess oxygen (ppm@15%O_2), and a SO_x emissions concentration of no more than 150 ppm@15%O_2.

STATE

The federal Clean Air Act is implemented by the California Air Resources Board (CARB) and each local air district. CARB, under authority granted by the Mulford-Carrell Air Resources Act, is required to adopt state ambient air quality standards for criteria air contaminants that can be, and often are, more stringent than those adopted by the U.S. EPA. For instance, the state has its own ambient air quality standards for PM10, PM2.5, and ozone among others. The local air districts are required to prepare air quality plans and promulgate specific air quality regulations that are approved by CARB, in order to seek and maintain compliance with the state ambient air quality standards (California Health and Safety Code, Part 3, Chapter 10). When power plants are licensed by the Energy Commission, the local air district's permit is part of that license, as the license incorporates the conditions the local air district would otherwise have required for compliance with state law.

LOCAL

Bay Area Air Quality Management District

As part of the licensing process, in lieu of issuing a construction permit for the SFERP facility, the District will prepare a Determination of Compliance (DOC). This document evaluates whether and under what conditions the proposed project will comply with the District's applicable rules and regulations. The Energy Commission staff coordinated its air quality analysis with the District staff as they prepared the DOC, and has incorporated the Preliminary DOC

recommended conditions of certification in this Preliminary Staff Assessment (PSA).

The project is subject to the specific District rules and regulations that are briefly described below:

Regulation 2

Rule 1 - General Requirements. This rule contains general requirements, definitions, and a requirement that an applicant submit an application for an authority to construct and permit to operate.

Rule 2 - New Source Review. This rule applies to all new and modified sources. The following sections of Rule 2 are the regulations that are applicable to this project.

- Section 2-2-301 - BACT Requirement: This rule requires that BACT be applied for each pollutant which is emitted in excess of 10.0 pounds per day.
- Section 2-2-302 - Offset Requirement, Precursor Organic Compounds and Nitrogen Oxides. This section applies to projects with an emissions increase of 50 tons per year or more of organic compounds and/or NO_x. Offsets shall be provided at a ratio of 1.15 tons of emission reduction credits for each 1.0 ton of proposed project permitted emissions.
- Emission reductions of nitrogen oxides and/or sulfur dioxide may be used to offset increased emissions of PM10 at offset ratios deemed appropriate by the Air Pollution Control Officer.
- A facility that emits less than 100 tons of any pollutant may voluntarily provide emission offsets for all, or any portion, of their PM10 or sulfur dioxide emissions increases.
- Section 2-2-606 - Emission Calculation Procedures, Offsets. This section requires that emission offsets be provided from the District's Emissions Bank, and/or from contemporaneous actual emission reductions.

Rule 7-Acid Rain. This rule applies the requirements of Title IV of the federal Clean Air Act, which are spelled out in Title 40, Code of Federal Regulations, section 72. The Title IV requirements will include the installation of continuous emission monitors to monitor acid deposition precursor pollutants.

Regulation 6

Particulate Matter and Visible Emission. The purpose of this regulation is to limit the quantity of particulate matter in the atmosphere. The following two sections of Regulation 6 are directly applicable to this project:

- Section 301 - Ringelmann No. 1 Limitation: This rule limits visible emissions to no darker than Ringelmann No. 1 for periods greater than three minutes in any hour.

- Section 310 - Particulate Weight Limitation: This rule limits source particulate matter emissions to no greater than 0.15 grains per standard dry cubic foot.

Regulation 9

Rule 1 - Limitations

- Section 301: Limitations on Ground Level Sulfur Dioxide Concentration. This section requires that emissions of sulfur dioxide shall not impact at ground level in excess of 0.5 ppm for 3 consecutive minutes, or 0.25 ppm averaged over 60 minutes, or 0.05 ppm averaged over 24 hours.
- Section 302: General Emission Limitation. This rule limits the sulfur dioxide concentration from an exhaust stack to no greater than 300 ppm dry.

Rule 9 - Nitrogen Oxides from Stationary Gas Turbines. Effective January 1, 1997, this rule limits gaseous fired, SCR equipped, combustion turbines rated greater than 10 MW to 9 ppm@15%O_2.

SETTING

CLIMATE AND METEOROLOGY

The project is proposed to be located in the eastern part of San Francisco. The site is a few feet above sea level and is adjacent to the San Francisco Bay. The climate of the San Francisco area is dominated by a semi-permanent, high pressure system off the Pacific Coast, known as the Pacific High. During the summer months, the Pacific High extends to and often over the western United States, causing low pressure systems to pass north of the Pacific High into Canada. The relatively colder temperatures of the Pacific Ocean cause coastal stratus and fog to form. Brisk westerly winds blow throughout the afternoon and evening hours, which carry fog inland in the late afternoon and evening. The fog can often persist through mid-morning.

During the winter months, the Pacific High moves south, allowing low pressure systems to move through California. Cloud cover, precipitation, and generally strong winds prevail during this period.

About 80 percent of the average annual rainfall (approximately 20 inches) in the area occur between the months of November and March. Between storms, skies are fair, winds are light, and temperatures are moderate.

Temperatures in the general area of the site are moderated due to their proximity to the ocean and to the San Francisco Bay. The temperatures range from the mid-50s to low-70s in the summer, fall and spring, and from the mid-40s to low-60s during the winter.

Pacific Gas and Electric (PG&E) collects meteorological data at the Potrero power plant site, about a quarter of a mile north of the proposed site. The data collected include wind directions, wind speed, temperature, and atmospheric stability class. The District has determined that the collected meteorological data are representative of the area's meteorology, and that it is appropriate to use for air quality dispersion modeling analysis for this project.

Quarterly wind roses, which are graphic representations showing wind speeds and directions based on data collected in 1992, are shown in Figures 8.1-5a to 5e (SFPUC 2005a). At the project site, the winds blow predominately from the west from April through September. From October through February, the wind directions are more variable, with winds blowing predominately from the north, southeast and west. Mixing heights in the area, which represent the altitudes to which different air masses mix together, have been estimated to range from a low of approximately 80 meters in the morning to a high of 2,300 meters in the afternoon. High mixing heights, normally associated with unstable conditions, can lead to greater dispersion of air contaminants (Smith et al. 1984). When the mixing height is low and the wind is calm, air contaminants can be trapped near the ground.

AMBIENT AIR QUALITY STANDARDS

The Federal Clean Air Act and the California Clean Air Act both require the establishment of standards for ambient concentrations of air pollutants, called ambient air quality standards (AAQS). The state AAQS, established by the CARB, are typically lower (more protective) than the federal AAQS, which are established by the EPA. The state and federal air quality standards are listed in **AIR QUALITY Table 2**. As indicated in **AIR QUALITY Table 2**, the averaging times for the various air quality standards, the times over which they are measured, range from one-hour to an annual average. The standards are read as a concentration, in parts per million (ppm), or as a weighted mass of material per a volume of air, in milligrams or micrograms of pollutant in a cubic meter of air (mg/m^3 or $\mu g/m^3$, respectively).

In general, an area is designated as attainment if the concentration of a particular air contaminant does not exceed the standard. Likewise, an area is designated as non-attainment for an air contaminant if that contaminant standard is violated. Where not enough ambient data are available to support designation as either attainment or non-attainment, the area can be designated as unclassified. The unclassified area is normally treated the same as an attainment area for regulatory purposes. An area could be attainment for one air contaminant while non-attainment for another, or attainment for the federal standard and non-attainment for the state standard for the same air contaminant. The District includes all or portions of nine counties in the Bay Area: all of San Francisco, San Mateo, Santa Clara, Alameda, Contra Costa, Napa and Marin Counties, and the southwest portion of Solano County and the southern portion of Sonoma County.

AIR QUALITY Table 2
Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary	Secondary
Ozone(O_3)	1-hour	0.09 ppm (180 µg/m^3)	0.12 ppm (235 µg/m^3)	Same as primary
Particulate Matter (PM10)	Ann.Geo. Mean	20 µg/m^3	---	Same as primary
	24-hour	50 µg/m^3	150 µg/m^3	
	Ann.Arit. Mean	---	50 µg/m^3	
Fine Particulate Matter (PM2.5)	24-hour	No separate standard	65 µg/m^3	Same as primary
	Ann.Arit. Mean	12 µg/m3	15 µg/m^3	Same as primary
Carbon Monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	None
	8-hour	9 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	
Nitrogen Dioxide (NO_2)	1-hour	0.25 ppm (470 µg/m^3)	---	Same as primary
	Ann.AritMean	---	0.053 ppm (100 µg/m^3)	
Lead(Pb)	30-day	1.5 µg/m^3	---	Same as primary
	Cal. Quarter	---	1.5 µg/m^3	
Sulfur Dioxide (SO_2)	Ann.Arit. Mean	---	0.03 ppm (80 µg/m^3)	---
	24-hour	0.04 ppm (105 µg/m^3)	0.147 ppm (365 µg/m^3)	---
	3-hour	---	---	0.5 ppm (1300 µg/m^3)
	1-hour	0.25 ppm (655 µg/m^3)	---	---
Sulfates	24-hour	25 µg/m^3	No federal standard	
H_2S	1-hour	0.03 ppm (42 µg/m^3)	No federal standard	

Source: California Air Resources Board

EXISTING AMBIENT AIR QUALITY

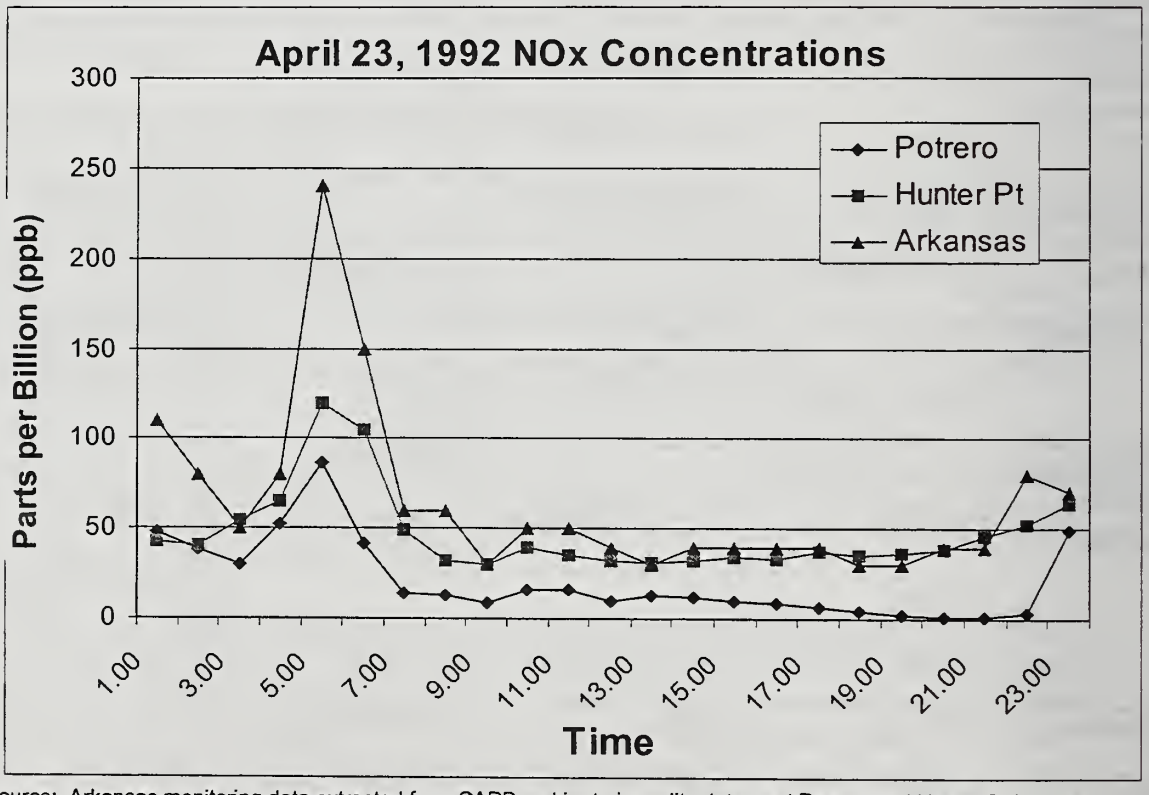
Currently, the District and the CARB measure ambient air quality concentrations for NO_x, VOC, CO, PM10, PM2.5 and SO_2 at the Arkansas Street monitoring station. This monitoring station is located about one-half mile northwest of the proposed facility location. Questions arose from the community during various

workshops and meetings regarding whether the data collected at the Arkansas monitoring station represents the actual ambient air quality in the Potrero and Hunters Point communities. The residents of these two communities expressed concern that the air quality conditions measured at the Arkansas monitoring station may not represent the conditions in the Potrero and Hunters Point communities.

Do the Arkansas Street data represent site conditions?

Ambient air monitoring data measured in 1992 by PG&E, using standard methods, at the Potrero and Hunters Point power plants, provide evidence that it does. Staff randomly picked a date in 1992 and compared the measured hourly NO_x ambient concentrations at three sites (Arkansas Street, the Potrero power plant, and the Hunters Point power plant). The results are presented in **AIR QUALITY FIGURE 1**.

AIR QUALITY FIGURE 1



Source: Arkansas monitoring data extracted from CARB ambient air quality data, and Potrero and Hunter Point data extracted from PG&E own measurements in 1992.

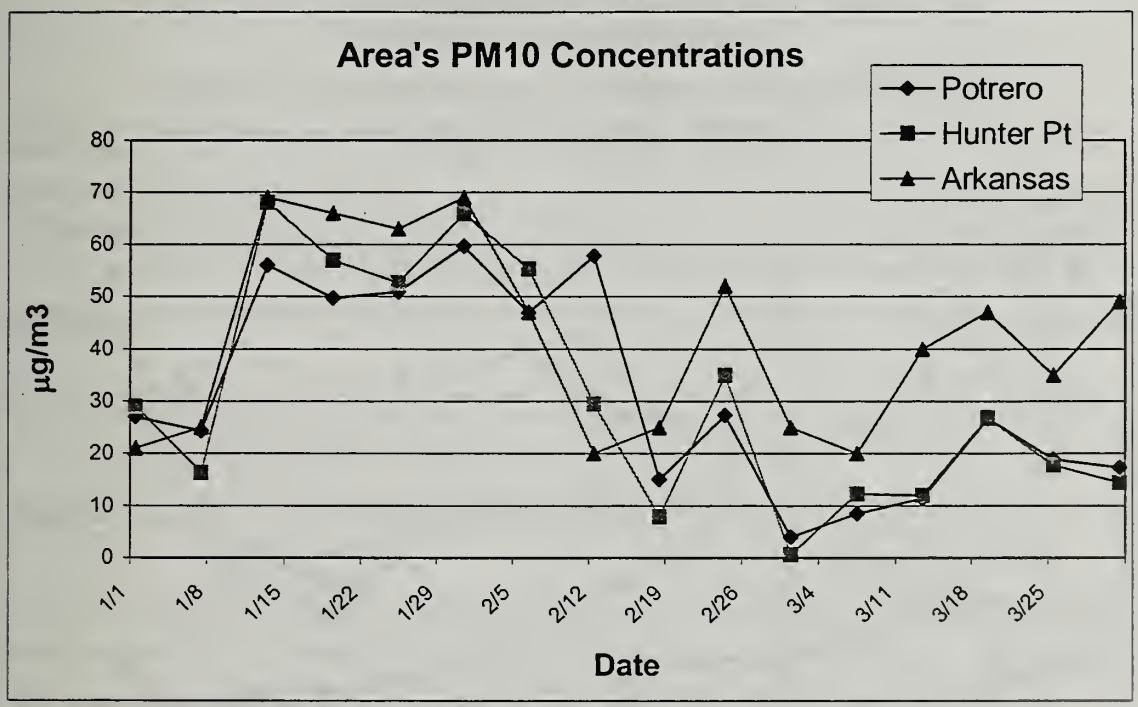
The ambient concentrations of NO_x that were measured at all three sites show a consistent pattern of peak and bottoms at all three sites. More importantly, the measured NO_x concentrations in Potrero and Hunters Point are generally lower than those measured at the Arkansas monitoring station. Therefore, staff believes that the Arkansas Street monitoring station data represent the local

ambient air quality, and the use of these data would be more conservative to assess the impacts and mitigation for the proposed SFERP facility.

Staff also compared the entire winter quarter's PM10 data at all three locations above and presented them in **AIR QUALITY FIGURE 2**.

Similar to the measured NO_x concentrations, the measured PM10 concentrations from all three monitoring stations show a consistent behavior and the same order of magnitude concentrations for PM10. Staff believes that the use of the current Arkansas monitoring station data would be appropriate to assess the impacts and mitigation for the proposed SFERP facility.

AIR QUALITY FIGURE 2



Source: Arkansas Street data extracted from the ARB ambient air quality data.
Potrero and Hunters Point data extracted from PG&E own measurements in 1992.

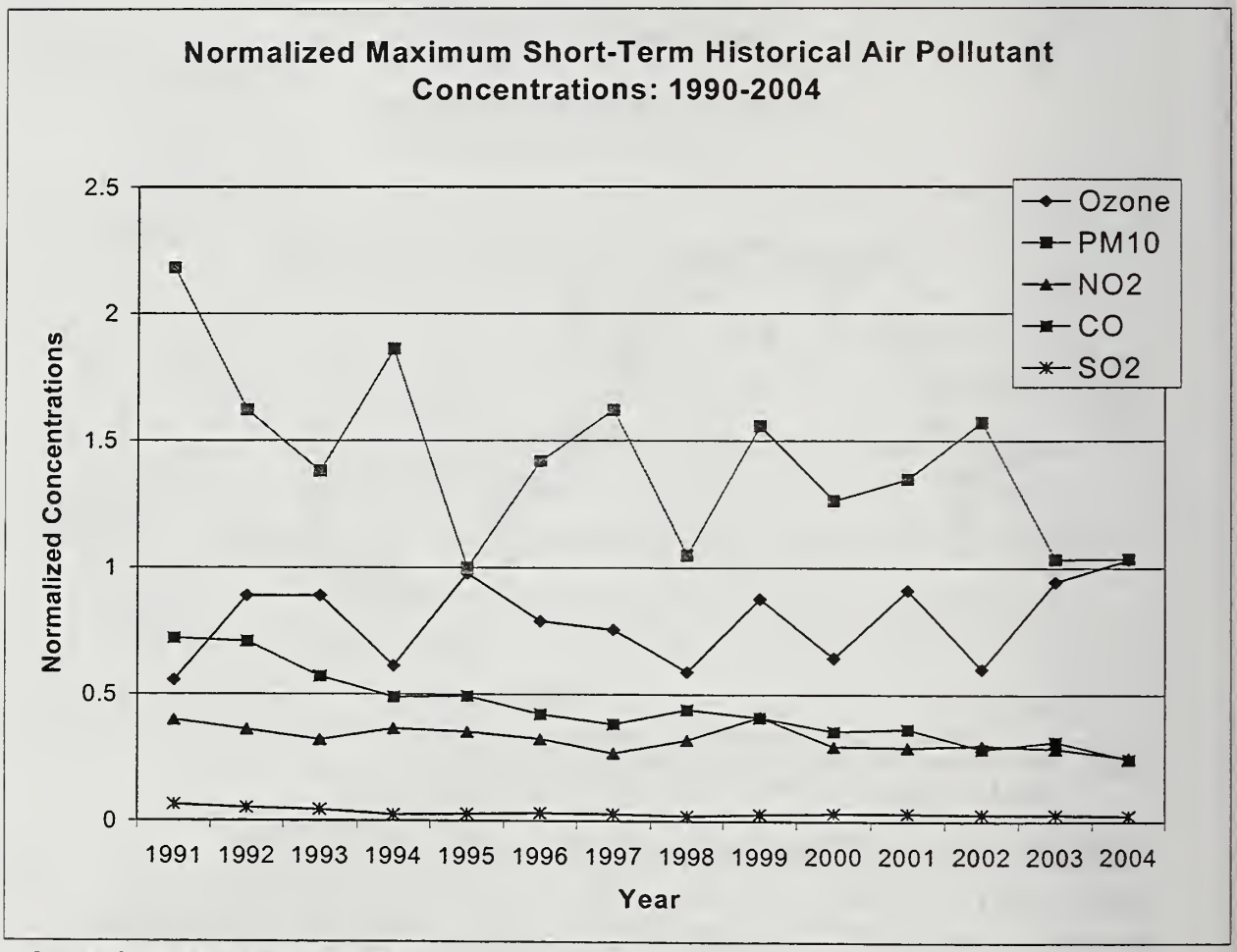
Discussion of existing ambient air quality conditions

AIR QUALITY FIGURE 3 summarizes the historical air quality data for the project location for PM10, CO, SO_2, O_3, and NO_2. In **AIR QUALITY FIGURE 3**, the normalized concentrations represent the ratio of the highest measured concentrations in a given year to the most stringent applicable national or state ambient air quality standard. Therefore, normalized concentrations lower than one indicate that the measured concentrations were lower than the most stringent ambient air quality standard. Based on the ambient concentration data collected, the area is consistently below the most stringent ambient air quality standards for all criteria pollutants except for PM10. Below is an in-depth discussion of ambient air quality conditions in the area for O_3, NO_2, CO and PM10.

Ozone

Ozone is not directly emitted from stationary or mobile sources, but is formed as the result of chemical reactions in the atmosphere between nitrogen oxides and volatile organic compounds in the presence of sunlight. The ambient ozone concentrations recorded between 1990 and 2004 have ranged from 5 to 9 parts per hundred millions (pphm). The entire bay area air basin is classified as serious non-attainment for the state 1-hour ozone air quality standard; however, the local area did not experience any violations of either the state or federal ozone air quality standards.

AIR QUALITY FIGURE 3



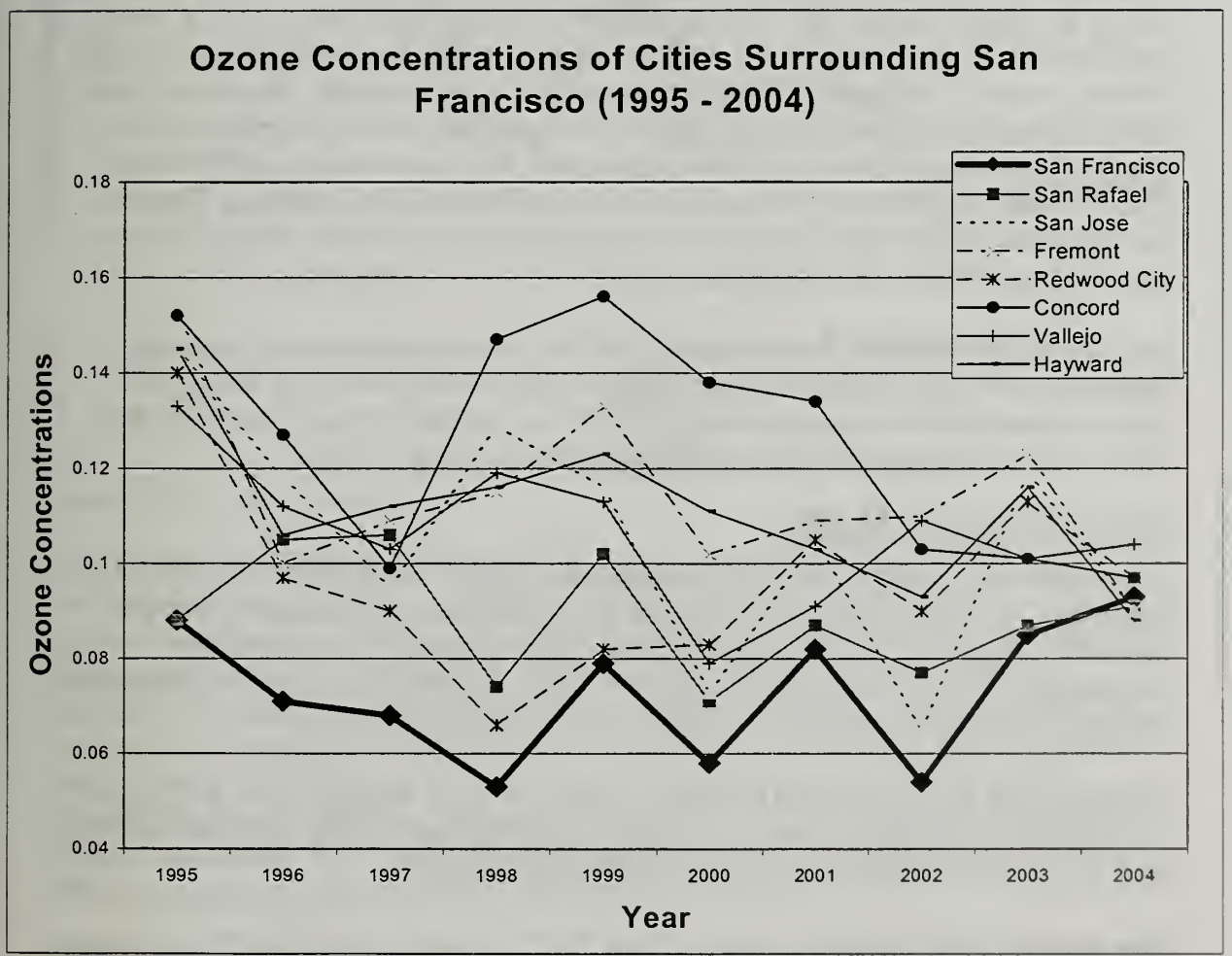
Source: CARB ambient air quality data.

AIR QUALITY FIGURE 4 represents the ozone concentrations of the area (between 1995 to 2004) compared to other cities surrounding the site. This figure shows that the area, during that time period, did not experience a violation of any ozone air quality standard. It also shows that its ambient ozone concentrations are lower than in other surrounding cities.

Nitrogen Dioxide

The entire Bay Area air basin is classified as attainment for the state 1-hour NO_2 standard. The NO_2 levels in the area are no more than half of the most stringent NO_2 ambient air quality standards, as shown in **AIR QUALITY FIGURE 3**. Approximately 90 percent of the NO_x emitted from combustion sources is NO, while the balance is NO_2. NO is oxidized in the atmosphere to NO_2, but some level of photochemical activity is needed for this conversion. The highest concentrations of NO_2 typically occur during the fall and not in the winter when atmospheric conditions favor the trapping of ground level releases but lack significant photochemical activity (less sun light). In the summer the conversion rates of NO to NO_2 are high but the

AIR QUALITY FIGURE 4



Source: CARB ambient concentration data.

relatively high temperatures and windy conditions disperse pollutants, preventing the accumulation of NO_2 to levels approaching the one-hour ambient air quality standard.

Carbon Monoxide

The area is classified as attainment for the state 1-hour and 8-hour CO standards. Indeed, the highest CO concentration levels measured in the area are at least 30 percent lower than the most stringent California ambient air quality standard and are on a slight downward trend (see **AIR QUALITY FIGURE 3**). The highest concentrations of CO occur when low wind speeds and a stable atmosphere trap the pollution emitted at or near ground level in what is known as the stable boundary layer. These conditions occur frequently in the wintertime late in the afternoon, persist during the night and may extend one or two hours after sunrise.

Particulate Matter

The entire Bay Area air basin is classified as non-attainment for the state 24-hour PM10 air quality standards. But, as shown in **AIR QUALITY FIGURE 3**, PM10 concentrations measured at the Arkansas site show a declining trend in the last thirteen years. The highest PM10 concentrations are normally measured in the winter, especially during evening and night hours (Bay Area 2000 Clean Air Plan). During wintertime high PM10 episodes, the main sources of PM10 are wood smoke, combustion of fossil fuels, and entrained dust particles. On an annual basis, since 1995, the area has experienced one to six violations of the state 24-hour PM10 air quality standard during late fall and early winter.

AIR QUALITY FIGURE 5 represents the PM10 concentrations in the area (between 1995 to 2004) compared to other cities surrounding the site. This figure shows that the area measured PM10 concentrations correspond to the same levels measured at the surrounding sites in the Bay Area.

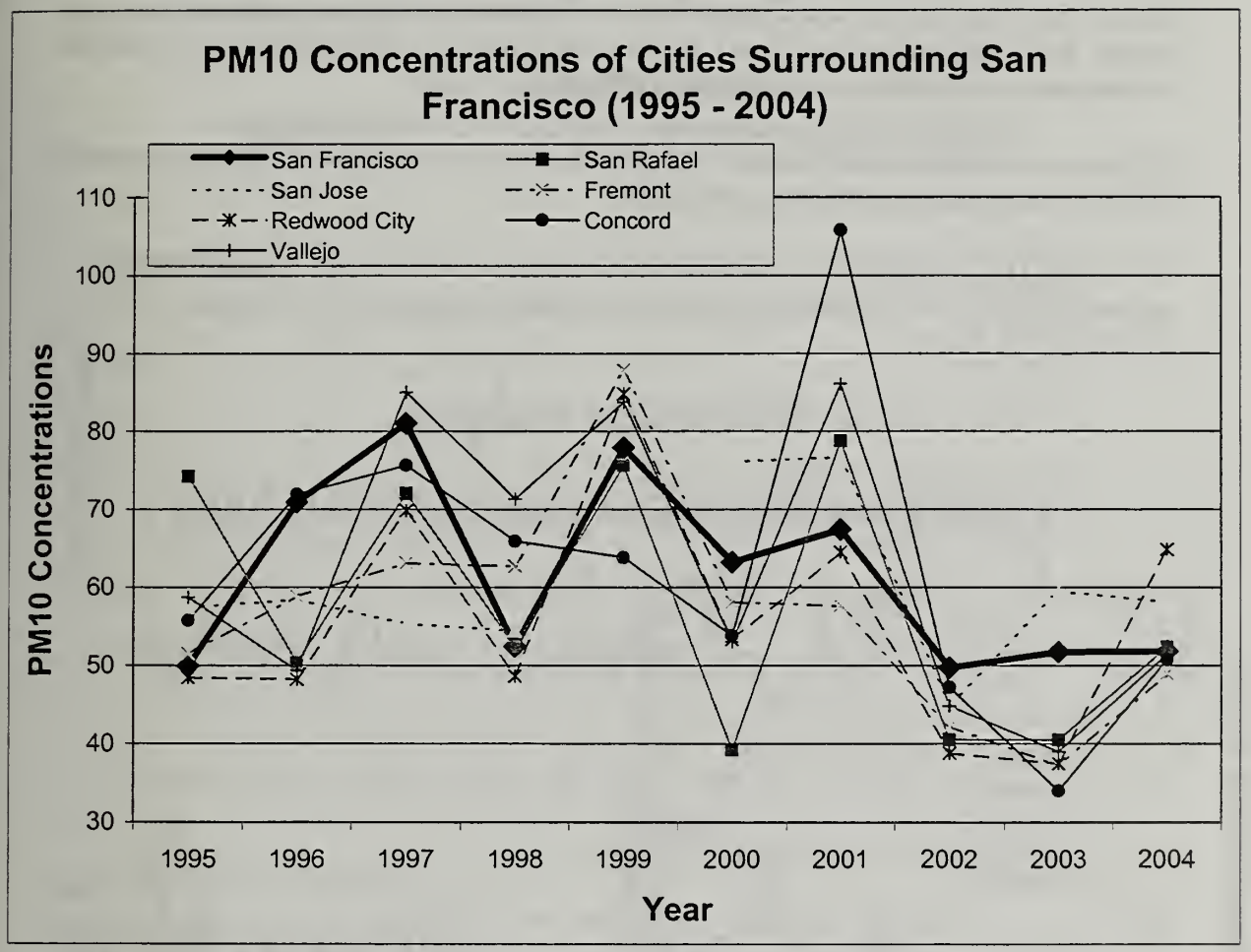
Fine Particulate Matter

Fine particulate matter, or PM2.5 (particulate matter less than 2.5 microns in diameter), is derived mainly from either the combustion of materials, or from precursor gases (SO_x, NO_x, and VOC) through complex reactions in the atmosphere. PM2.5 consists mostly of sulfates, nitrates, ammonium, elemental carbon, and a small portion of organic and inorganic compounds.

The EPA has promulgated a 65 $\mu g/m^3$ 24-hour PM2.5 standard and a 15 $\mu g/m^3$ annual PM2.5 standard, and has recently classified the district as attainment for both the federal annual and 24-hour PM2.5 standards.

The ARB recently adopted a new annual PM2.5 standard of 12 μg/m3, but has not determined the attainment status of any district. The ARB also considered adopting a new 24-hour PM2.5 standard, but deferred the adoption of such a standard until a later date.

AIR QUALITY FIGURE 5



Source: CARB ambient air quality data.

AIR QUALITY FIGURE 6 shows the highest measurements of PM2.5 and particulates that are nitrate-, sulfate-, ammonium- and chlorine-based. These measurements were taken at the Arkansas Street monitoring station in 1999 and 2000. **AIR QUALITY FIGURE 6** shows that the PM2.5 portion (which is generally caused by combustion processes from industrial, mobile sources and domestic activities) typically corresponds to and remains within 40 to 50 percent of the measured PM10. It should be noted, however, that chlorine-based particulates (sea salts) can account for between 3 to 30 percent of the ambient PM10 measured. Staff believes that spray salts can influence the measured PM10 at monitoring stations located near the ocean.

Nitrates and Sulfates

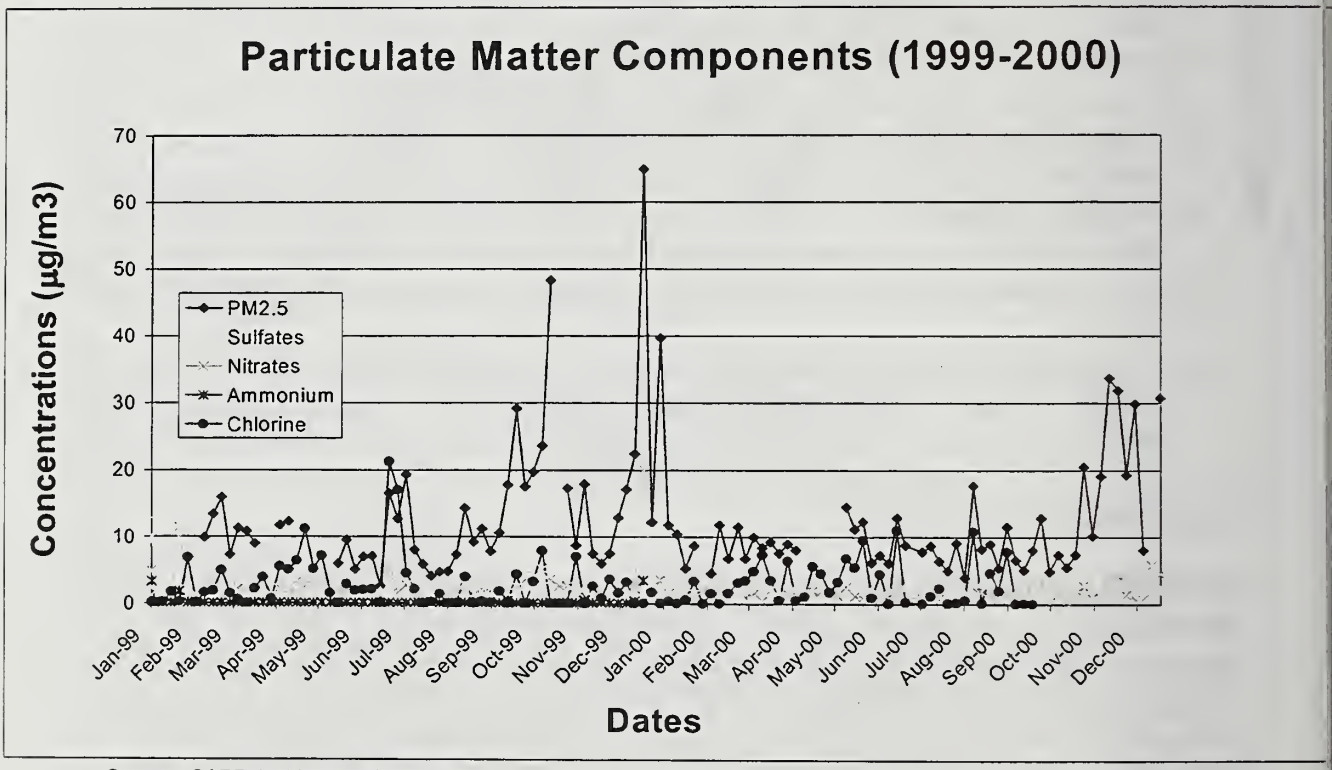
PM nitrate (mainly ammonium nitrate) is formed in the atmosphere from the reaction of NO_x and ammonia. NO_x, as emitted from combustion sources, is mainly in the form of nitric oxide (NO). NO converts to NO_2 primarily by reacting with ozone in the ambient air. The formed NO_2 can convert back to NO, which sustains the ozone formation. NO_2 can also form organic nitrates, or be oxidized

to nitric acid by available hydroxyl (OH) radicals in the ambient air. Nitric acid reacts with ammonia in ambient air to form ammonium nitrate. Ammonium nitrate, in its particulate form, can remain suspended in the ambient air and/or be transported long distance downwind as PM2.5.

Ammonium nitrate, under certain conditions of heat and humidity, breaks down to NO_x and starts a new ozone cycle again.

AIR QUALITY FIGURE 6 shows that the wintertime nitrate ion concentrations can range from 5 to 30 percent of the total PM2.5 and could be a major contributor to PM2.5.

AIR QUALITY FIGURE 6



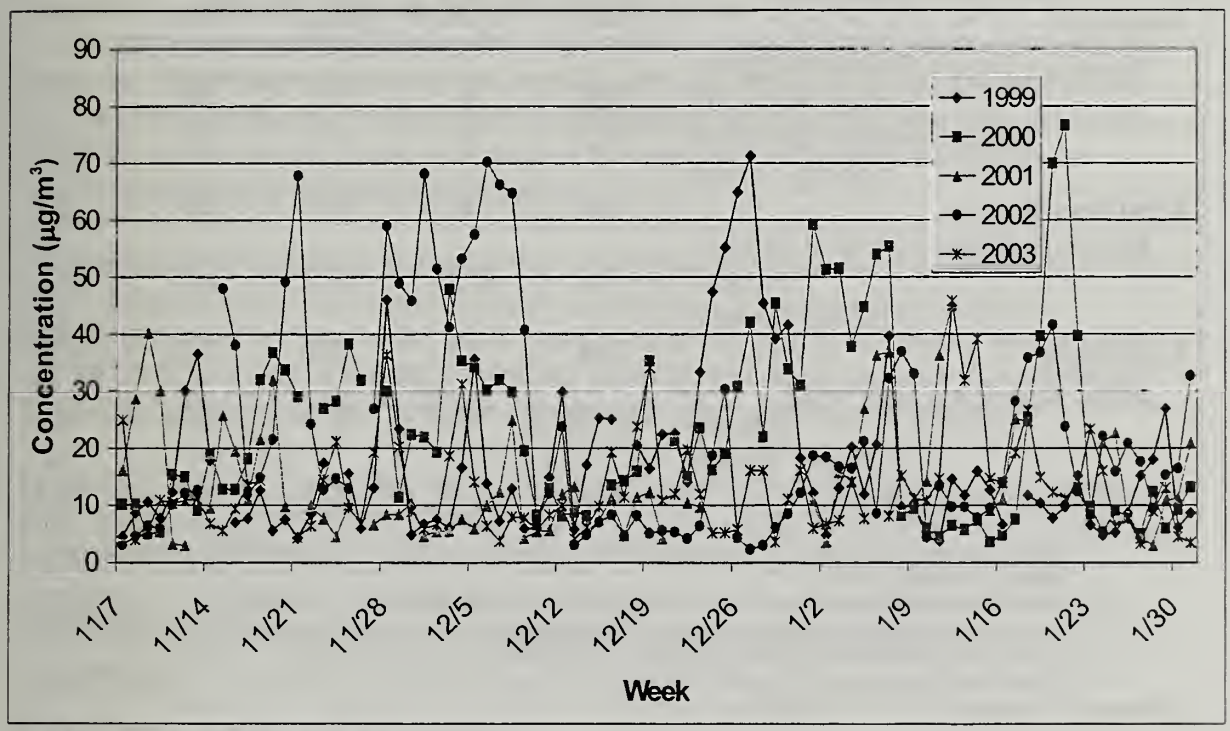
Source: CARB Ambient Air Quality Data.

PM sulfate (mainly ammonium sulfate) is formed in the atmosphere from the oxidation of SO_2 and subsequent neutralization by ammonia in the atmosphere. The oxidation of SO_2 depends on many factors, which include: the availability of hydroxyl (OH), hydroperoxy (HO_2) and methylperoxy (CH_3OH) radicals, and humidity. **AIR QUALITY Figure 6** shows that the sulfate portion can range from 5 to 20 percent of the total PM2.5 measured.

AIR QUALITY Figure 7 shows the measured PM2.5 concentrations for the period of November to January for the five years 1999 to 2003. This figure shows that the area exceeded the federal 24-hour PM2.5 standards for 2 to 7

days in 1999, 2000, and 2002. No violation of the federal PM2.5 standard was detected for the years 2001 and 2003.

AIR QUALITY FIGURE 7
Measured PM2.5 Concentrations (1999-2003)



Source: CARB ambient air quality data.

PROJECT DESCRIPTION

The proposed project consists of three natural gas-fired LM6000 Sprint combustion turbines and a two-cell cooling tower.

The turbines would be operating in simple cycle mode to produce approximately 145 MW of electricity. The three turbines combined would operate up to 12,000 hours per year (SFERP2005a, pp. 8.1-21). The applicant (City) proposes to equip each combustion turbine with water injection and selective catalytic reduction (SCR) systems to limit the NO_x emissions to 2.5 ppm@15 percent O_2. The City also proposes to install a CO oxidation catalyst system on each turbine to maintain CO emissions to no more than 4 ppm (SFERP2005a, pp. 8.1-28).

The City requests that the project be analyzed with the assumption of 250 hours of start-up and shutdowns for each turbine each year (SFERP2005a, pp. 8.1-29).

Using the proposed normal operation hours (12,000 hours per year) and the proposed start-up and shut down hours (250 hours per year, per turbine), the City has provided an estimate of the facility's emissions. The facility's maximum

hourly, daily and annual emissions for NO_x, VOC, PM10, SO_x and CO are tabulated in **AIR QUALITY Table 3** below.

AIR QUALITY TABLE 3
Facility's Maximum Hourly, Daily and Annual Emissions

Equipment	NO_x	VOC	SO_x	CO	PM10[1]
Maximum Hourly Emissions (lb/hr)					
Turbine (start-up)[2]	120	6	1.3	30	9
Turbine (normal operation)	13.2	6	1.3	30	9
Cooling Towers	-	-	-	-	<0.1
Total Hourly	**120**	**6**	**1.3**	**30**	**9**
Maximum Daily Emissions (lb/day)					
Turbine[3]	744	97.8	32.3	378	216
Cooling Towers[4]	-	-	-	-	1
Total Daily	**744**	**98**	**328**	**378**	**217**
Maximum Annual (ton/year)					
Turbine[5]	39.8	7.7	2.7	27.9	18
Cooling Towers	-	-	-	-	0.2
Total Annual Emissions	**39.8**	**7.7**	**2.7**	**27.9**	**18.2**

Notes:
1. All PM10 emissions from natural gas-fired turbines are treated as PM2.5 (California Emission Inventory and Reporting System, CARB).
2. The turbine hourly emissions occur during start up, which is approximately 40 lbs/hr per turbine.
3. The turbine daily emissions include 4 hours of start-up and shut down for each turbine ((4*120)+ 20(13.2))=744.
4. Cooling tower emissions were estimated using 24 hour day operational schedule.
5. The turbine annual emissions include 750 hours of startup/shutdown and 12,000 hours of normal operation.

Source: AFC Section 8.1.5 (SFERP2005a).

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

Staff assesses three kinds of impacts: construction, operation, and cumulative effects. As the name implies, construction impacts result from the emissions occurring during the construction of the project. The operation impacts result from the emissions of the proposed project during operation. Cumulative impacts analysis assesses the impacts that result from the proposed project's incremental effect viewed over time, together with other closely related past, present, and reasonably foreseeable future projects whose impacts may compound or increase the incremental effect of the proposed project. (Pub. Resources Code § 21083; Cal. Code Regs., tit. 14, §§ 15064(h), 15065(c), 15130, and15355.)

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

Air dispersion models provide a means of predicting the location and ground level magnitude of the impacts of a new emissions source. These models consist of several complex series of mathematical equations, which are repeatedly calculated by a computer for many ambient conditions. The model results are often described as a unit of mass per volume of air, such as micrograms per cubic meter ($\mu g/m^3$).

The City has used an EPA-approved ISCST3 model to estimate the impacts of the project's NO_x, PM10, CO, and SO_x emissions resulting from project construction and operation. A description of the modeling analysis and its results are provided in Section 8.1.5.3 of the AFC (SFERP2005a). Staff added the applicant's modeled impacts to the available highest ambient background concentrations recorded during the previous three years from nearby monitoring stations. Staff then compared the results with the ambient air quality standards for each respective air contaminant to determine whether the project's emission impacts would cause a new violation of the ambient air quality standards or would contribute to an existing violation.

The ambient air quality standards that staff uses as a basis for determining project significance are health-based standards. They are set at levels to adequately protect the health of all members of the public, including those most sensitive to adverse air quality impacts, such as the aged, people with existing illnesses, and infants and children, while providing a margin of safety.

In general, the inputs for the modeling include stack information (exhaust flow rate, temperature, and stack dimensions), specific turbine emission data and meteorological data, such as wind speed, atmospheric conditions, and site elevation. For this project, the meteorological data used as inputs to the model included hourly wind speeds and directions measured a quarter mile north of the project site.

CONSTRUCTION IMPACTS

The results of the project's construction impacts analysis are presented in **AIR QUALITY Table 4**. The modeling analysis included both the fugitive dust and vehicle exhaust emissions, which include PM10, NO_x, and CO. In **AIR QUALITY Table 4**, the first and second columns list the air contaminant, i.e., NO_2, PM10, and CO, and the averaging time for each air contaminant analyzed. The third column presents the project emission impacts, and the fourth column presents the highest measured concentration of the criteria air contaminants in the ambient air (background). The fifth column presents the total impact, i.e., the sum of project emission impact and background measured concentration.

The applicant submitted a modeling analysis showing that the project construction activities would further exacerbate existing violations of the state 24-hour PM10, the state annual PM2.5 and the federal 24-hour PM2.5 standards.

AIR QUALITY Table 4
Maximum Project Construction Impacts

Pollutants	Avg. Period	Impacts ($\mu g/m^3$)	Background ($\mu g/m^3$)	Total Impact ($\mu g/m^3$)	State Standard ($\mu g/m^3$)	Percent of Standard
NO_2	1-hr.	97.1	141	238	470	50%
CO	8-hr.	73.8	3644	3,718	10,000	37%
PM10	24-hr.	14.2	74	88	50	**180%**

Source: AFC, Appendix 8.1D, Table 8.1D-4 (SFERP2005a).

Staff reviewed the modeling and finds that construction of the facility would result in unavoidable short-term PM10 impacts. Because the area is non-attainment for the state's annual and 24-hr PM10 standards, the impacts from construction of the project are significant.

MITIGATION

To mitigate the impacts due to construction of the facility, the City has proposed the following mitigation measures:

a) All unpaved roads and disturbed areas in the project and linear construction sites will be watered until sufficiently wet to ensure that no visible dust plumes leave the project site.

b) Vehicle speeds will be limited to 15 miles per hour within the construction site.

c) All construction equipment vehicle tires will be washed or cleaned free of dirt prior to entering paved roadways.

d) Gravel ramps will be provided at the tire washing/cleaning station.

e) All entrances to the construction site will be graveled or treated with water or dust soil stabilization compounds.

f) Construction areas adjacent to any paved roadway will be provided with sandbags to prevent run-off to the roadway.

g) All paved roads within the construction site will be swept twice daily when construction activity occurs.

h) At least the first 500 feet of any public roadway exiting from the construction site will be swept at least twice daily on days when construction activity occurs, and twice daily on any other day when dirt or runoff from the construction site is visible on the public roadways.

i) All soil storage piles and disturbed areas that remain inactive for longer than 10 days will be covered, or be treated with appropriate dust suppressant compounds.

j) All vehicles that are used to transport solid bulk material on public roadways and that have potential to cause visible emissions will be provided with a cover, or the materials will be sufficiently wetted and loaded onto the trucks in a manner to provide at least one foot of freeboard.

k) Wind erosion control techniques such as windbreaks, water, chemical dust suppressants, and vegetation will be used on all construction areas that may be disturbed. Any windbreaks used will remain in place until the soil is stabilized or permanently covered with vegetation.

l) Any construction activities that may cause excessive fugitive dust will cease when the wind exceeds 25 miles per hour unless water, chemical dust suppressants, or other measures have been applied to reduce dust such that no visible dust leaves the project site.

To reduce the impacts from the construction of the proposed project, staff recommends the implementation of mitigation measures contained in Conditions of Certification **AQ-SC1 to AQ-SC5**. These conditions include all of the City's proposed mitigation measures. In addition, staff's proposed Condition of Certification **AQ-SC3** requires the City to erect an eight-foot high temporary fence surrounding the construction site and laydown area to lessen the PM impact due to construction of the facility. This fence should be lined with material (such as solid construction tarp) to prevent transport of fugitive dust to publicly accessible areas. This fence can be removed after the end of the facility's construction period. Staff's proposed Condition of Certification **AQ-SC5** requires the use of ultra-low sulfur diesel fuel, low emission diesel engines and, if appropriate, soot filters on diesel-fueled construction equipment during construction.

OPERATION IMPACTS

The City has provided a modeling analysis using the EPA-approved ISCST3 model to estimate the impacts of the project's NO_x, PM10, CO, and SO_x emissions resulting from project operation (SFERP2005a).

Similar to the assessment of construction impacts, staff added the modeled impacts to the available highest ambient background concentrations recorded during the previous three years from nearby monitoring stations to assess the project operational impacts.

Staff tabulated the results of the modeling analysis for turbines and cooling tower, including steady state and start-up events in **AIR QUALITY Table 5**. The analysis shows that the project does not cause any new violations of NO_2, CO or SO_2 air quality standards, even with worst case ambient concentrations recorded.

The project, however, would contribute to existing violations of the state 24-hour and annual PM10, and the federal 24-hour PM2.5 air quality standards. The project's impacts on the area's PM2.5 and PM10 air quality are significant.

AIR QUALITY Table 5
Project Operation Emission Impacts

Pollutants	Avg. Period	Impacts ($\mu g/m^3$)	Background ($\mu g/m^3$)	Total Impacts ($\mu g/m^3$)	Standard ($\mu g/m^3$)	Percent Standa
NO_2	1-hour (start up)	111.3	141	252	470[1]	54%
	1-hour (steady state)	8.3	141	149	470[1]	32%
	Annual	0.1	38	38	100[2]	38%
SO_2	1-hour	1.1	138	139	655[1]	21%
	24-hour	0.1	21	21	105[1]	20%
CO	1-hour (start up)	27.8	6,875	6,904	23,000[1]	30%
	8-hour	5.2	3,644	3,649	10,000[1]	36%
PM10	24-hour	1.2	74	75	50[1]	**150%**
	Annual	0.1	24.7	24.8	20[1]	**124%**
PM2.5	24-hour	1.2	77	78	65[2]	**120%**
	Annual	0.1	N/A	N/A	12[1]	N/A

[1] State standards
[2] Federal standards
Source: AFC Section 8.1 (SFPUC 2005a).

MITIGATION

Ozone Precursors

Because the project ozone precursor emissions can contribute to violations of the ozone air quality standards, the City proposes to mitigate the project's ozone precursors (NO_x and VOC) contribution with 47.5 tons of NO_x emission reduction credits (certificate number 896). These credits originated from the Potrero power plant site, which is one-quarter of a mile north of the proposed site. The amount of emission reduction credits would evenly offset the new ozone precursors emissions generated by the operation of the facility. Therefore, the project contribution to the ozone concentration is mitigated to a level of less than significance.

PM10

The City proposes to mitigate the project's PM10 contribution to the existing violations of the particulate matter standards in the area by increasing the use of high-efficiency street sweepers in southeast San Francisco to reduce road dust entrainment in the area. The City estimated that this control measure would generate up to 24 tons per year (TPY) of PM10 (3 TPY of which are PM2.5) emission reduction credits to mitigate the project emissions contribution.

Therefore, the project's PM10 contribution to existing violations is mitigated to a level of less than significance.

PM2.5

The City has estimated that the project's PM2.5 emissions to be as much as 18 TPY. As such, a minimum of 18 TPY of PM2.5 emission reduction credits would be needed to fully mitigate the project's contribution. As mentioned above, the City's proposed implementation of high-efficiency street sweepers can only generate about three tons of PM2.5 emission reduction credits. The City proposes to implement another program to subsidize area homeowners to replace existing wood stoves and fireplaces with natural gas or propane fueled units. The emission reductions from this measure would be used to mitigate the project's 5 tons of fine particulate matter contribution during wintertime, based on the annual shortfall of 15 tons prorated for the four winter months (November through February) when the PM2.5 violations occur. Staff estimates that the City would have to subsidize replacement or modification of approximately 107 wood stoves (93 lbs/unit) or 961 fireplaces (10.4 lbs/unit) to generate 5 TPY of PM2.5.

The City proposes, that in case that if the City does not want to go forward with the proposed woodstove replacement program, the City will provide SOx emission reduction credits to mitigate the project's remaining annual PM2.5 emission liability. The City has proposed a "3 to 1 ratio", i.e., for every pound of PM2.5 emissions from the proposed facility, three pounds of SOx are purchased to offset such increase. This offset ratio is consistent with the District Rule 2-2-301.1 requirements and is similar to ratios in other siting cases that the Commission has licensed in the past (East Altamont, Los Esteros). Using the 3:1 SOx:PM2.5 ratio, staff estimates that the City would need to provide 45 tons of SOx emission reduction credits to mitigate the remaining 15 TPY of PM2.5.

Staff recommends that SOx emission reduction credits be acquired in the local Hunters Point and/or the Potrero area if they are used to mitigate the project's remaining PM2.5 emission liability. The use of local SOx emission reduction credits would ensure that local PM2.5 impacts are effectively mitigated.

Staff recommends the addition of Conditions of Certification **AQ-SC10, -SC11 and -SC12** to address the requirements of the City's proposed street sweeping program and the City's proposed additional programs to mitigate the project's PM2.5 emission liability. Successful implementation of the City's proposed programs would reduce the project's PM2.5 impact to a level of less than significance.

CUMULATIVE IMPACTS

"Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or . . . compound or increase other environmental impacts." (CEQA Guidelines, § 15355.) A cumulative impact consists of an impact that is created as a result of a combination of the project

evaluated in the EIR together with other projects causing related impacts." (CEQA Guidelines, § 15130(a)(1).) Such impacts may be relatively minor and incremental, yet still be significant because of the existing environmental background, particularly when one considers other closely related past, present, and reasonably foreseeable future projects.

This analysis is concerned with "criteria" air pollutants. Such pollutants have impacts that are usually (though not always) cumulative by nature. Rarely will a project cause a violation of a federal or state criteria pollutant standard. However, a new source of pollution may contribute to violations of criteria pollutant standards because of the existing background sources or foreseeable future projects. Air districts attempt to attain the criteria pollutant standards by adopting attainment plans, which comprise a multi-faceted programmatic approach to such attainment. Depending on the air district, these plans typically include requirements for air "offsets" and the use of "Best Available Control Technology" for new sources of emissions, and restrictions of emissions from existing sources of air pollution.

Much of the preceding discussion is concerned with cumulative impacts. "Existing Ambient Air Quality" describes the air quality background in the Bay Area, followed by discussions of historic ambient levels for each of the significant criteria pollutants. "Construction Activities" discusses the SFERP project's contribution to the local existing background caused by project construction. This section includes three additional analyses:

- a summary of projections for criteria pollutants by the air district and the air district's programmatic efforts to abate such pollution;
- an analysis of the project's "localized cumulative impacts"-- direct emissions locally when combined with other local major emission sources (i.e., other San Francisco electric generation facilities); and
- a discussion of secondary pollution impacts, particularly ozone and PM10.

Summary of Projections

Ozone

The air district is currently classified as not in attainment (or "nonattainment") for the federal 1-hour ozone requirement.[1] Consequently, the air district is required to prepare and adopt an ozone attainment plan for submittal to the U.S. EPA describing how the air district will achieve attainment with the 1-hour standard. On October 24, 2001, the air district adopted its Revised San Francisco Bay Area Ozone Attainment Plan for the National 1-Hour Ozone Standard ("OAP"). Pursuant to state law, the air district had previously prepared and adopted the Bay Area 2000 Clean Air Plan ("CAP") for submittal to the California Air

[1] EPA designated the air district as in attainment with the standard in 1995 after five years of no exceedances. However, after exceedances of the standard in 1995 and 1996, EPA re-designated the district "nonattainment" in 1998. (OAP, p. 1.)

Resources Board ("CARB"). These two documents, which have been adopted by the agency's Board of Directors and are publicly available, provide a detailed description of ozone levels within the air district, and the district's program to achieve compliance with the federal standard.

The OAP states that the Bay Area meets the federal 1-hour ozone standard 99.9 percent of the time, but that there are rare occasions that the standard is exceeded on hot days in the inland valleys, especially near Livermore. (OAP, p.4.) Since 1980, the Bay Area's population has increased by more than 30 percent, and traffic has increased by more than 70 percent, but the level of per capita ozone exposure has decreased 70 percent since 1986. (CAP, pp. 9-10.) During the same period, peak ozone concentrations have diminished by an average of 1.2 percent per year on average. (CAP, p. 9.) For the period from 1990-2000, the highest number of violations occurred in Livermore (2.7 violations per annum) and Concord (1.0 violation per annum). (OAP, p. 4.) Notably, there have been no violations of the federal standard in San Francisco. (*Ibid.*)

The OAP describes the emissions inventory and breaks it down by county and source of emissions. The point source inventory includes over 20,000 different sources, and the summary of those sources includes the following narrative:

> *The inventory includes emissions from existing and new power plants, including proposed plants that have not yet received permit approval, based on California Energy Commission projections of capacity and demand. The inventory includes substantial increases in generation of electricity at Bay Area power plants. The power production in 2006 is projected to be more than twice the year 2000 levels. Production by existing plants will drop by 20 percent by 2006. That electric demand, plus the projected increases, will be generated by newly constructed plants. Because the new plants are much cleaner and more efficient than the existing plants, overall NO_x emissions for this source sector will decrease by 69 percent from 2000 to 2006. (OAP, p. 6.)*
>
> *The two principal ozone precursor emissions are NO_x and VOC (also called "ROG"). The dominant origin of these emissions is motor vehicles (49 percent of NO_x and 45 percent of VOC) and other mobile sources (35 percent of NO_x and 15 percent of VOC). (CAP, p. 4.) Industrial and commercial sources comprise one percent of NO_x emitting sources and five percent of VOC. Combustion sources, including power plants, comprise the source of 15 percent of NO_x and one percent of VOC.*
>
> *The air district is attempting to attain compliance with the ozone standard by imposing restrictions on the production and use of solvents and chemicals and requiring various transportation efficiency measures. Newer measures include restrictions on aerosol coatings, requirements for the storage of organic liquids, refinery flare monitoring, low-emission*

refinery valves, rules for architectural coatings, rules for depressurizing vessels, and a vehicle inspection and maintenance program. (OAP, pp. 25-28.) Measures required by CARB for vehicle emissions are also expected to significantly reduce the total of NO_x and VOC emissions in the Bay Area. (Ibid.) VOC and NO_x emissions will continue to decline in the Bay Area. For the period 1995 to 2006, the air district forecasts a VOC decline from 681 tons per day (tpd) to 432 tpd; during the same period NO_x emissions are forecast to decline from 752 tpd to 524 tpd. These reductions are calculated by the OAP to result in compliance with the ozone standard by 2006. (OAP, pp. 15-22.) Additional "contingency measures" are also identified in the plan should the goal of attainment not be reached. (OAP, p. 33.) The attainment plan, including emissions inventory and suggested control measures, is described in detail in the OAP.

Particulate Matter

EPA's current PM10 standard was adopted in 1987. The air district is in compliance with that federal standard, so there is no adopted implementation plan. However, the federal standards have been criticized for failure to be sufficiently health protective, and California has adopted far more stringent standards for PM10. Currently, virtually all air districts in the state (the lone exception is Lake County), including the Bay Area, are nonattainment with the state PM10 standard. There is no legal requirement for air districts to provide plans to attain the state PM10 standard, so air districts have not developed such plans. (See CAP, p. 12.) In 1997 the federal government adopted PM2.5 standards, as did the state in 2003. Neither the EPA nor CARB have classified the state's air districts as attainment (or nonattainment), so there are, as yet, no federal or state attainment plans for PM2.5.

However, the air districts do monitor for PM10 (and more recently, for PM2.5), and CARB inventories major stationary sources. This information provides a useful picture of what the levels of particulate pollution are in various parts of the state, and some measure of the trend lines for such emissions.

With regard to the air district, CARB has recently provided the following summary regarding PM10 trends:

As with other pollutants, the PM 10 statistics also show overall improvement. During the period for which data are available, the maximum annual average of quarters (state) decreased about 26 percent. [Para.] Calculated exceedence days for the State 24-hour standard dropped from a high of 123 days during 1988 to 30 days during 2002. The national 24-hour standard was last exceeded in 1991. Because many of the same sources contribute to both ozone and PM 10 exposure, future ozone precursor emission controls should help to ensure continued PM 10

improvements. (CARB, 2004 California Almanac of Emissions and Air Quality ["2004 Air Almanac"], p. 154.)

Despite this positive assessment, direct PM10 emissions have actually increased in the air district by roughly 10 percent since 1980. All stationary sources, including power plants, comprise roughly eight percent of total direct PM10 emissions; the dominating source of emissions is "Area-wide Sources," which is defined as "primarily fugitive dust sources." (2004 Air Almanac, p. 152.) [Table 4-14 (p. 152) from the Air Almanac.]

PM10 exceedences occur primarily in the winter during evening and night hours, from a combination of wood smoke, fossil fuel combustion, airborne dust entrained by motor vehicles, and construction. (CAP, p.12.) The largest source, wood-burning, occurs principally in winter and represents about one-third of district PM10 emissions. (*Ibid.*) Exceedances of the PM10 24-hour state standards are greatly influenced by weather (*ibid.*), usually occurring during periods of calm in the winter months.

The air district's annual pollution summaries for 2000-2003 indicate that the annual average PM10 levels, maximum 24-hour measurements, and number of days exceeding the state standard are fairly uniform throughout the Bay Area. (See **AIR QUALITY Table 6** below, which compares four such Bay Area locations.) Measurements for San Francisco do not differ greatly from those of measurements in the North Counties (e.g., Napa, Santa Rosa, San Rafael), the Eastern District (e.g., Concord, Livermore, Pittsburg), South Central Bay (e.g., Fremont, Redwood City), or the Santa Clara Valley (e.g., San Jose). In each of these locations, including San Francisco, there are several measured violations each year[2], with the highest 24-hour average normally between 50 and 100 ug/m3.

AIR QUALITY Table 6
PM10 Air Quality in the Four Bay Area Counties

	2000			2001			2002			2003		
	Ann. Avg.	Max. 24 hrs	Days	Ann. Avg.	Max. 24 hrs	Days	Ann. Avg.	Max. 24 hrs	Days	Ann. Avg.	Max. 24 hrs	Days
San Francisco	24	63	2	26.4	67	7	24.7	74	2	22.7	52	1
Napa	16.2	45	0	24	91	2	25.4	67	4	21.3	41	0
Pittsburg	16.4	56	2	20.6	98	NA	23.7	73	3	21.1	59	1
San Jose Central	26.7	76	7	28.9	77	4	NA	70	2	23.6	60	3

Applicable Standards (ug/m_3)
Annual Avg. State 20; U.S. 50
24-Hour State 50; U.S. 150
Source: BAAQMD Annual Air Pollution Summaries, years 2000-2003.

[2] PM 10 measurements are taken every *sixth* day. The air district thus states that "Actual days over the standard can be estimated to be six times the number shown."

If PM10 levels in the Bay Area are relatively uniform, they are also lower (both for 24-hour concentrations and annual averages) than the levels in many of the state's other air districts. (See, e.g., 2004 Air Almanac, p. 75, Table 2-13.) However, they are distinctly higher than the levels measured in "pristine" locations such as the national parks. (CARB Staff Report: Public Hearing to Consider Amendments to the Ambient Air Quality Standards for Particulate Matter and Sulfates, May 3, 2002, p. 6-12.) For instance, the aggregated three-year annual average PM10 level for Yosemite National Park is 8.52 ug/m3 (compared to the new state standard of 20); the aggregated three-year annual average PM2.5 level was 4.33 ug/m3 (compared to the new state standard of 12). (*Ibid.*)

As mentioned earlier, the U.S. EPA has identified the Bay Area as attainment for both the federal 24-hour and the federal annual PM2.5 air quality standards.

California has recently adopted a new PM2.5 annual average standard of 12 ug/m3, which is again more stringent than the federal standard. Because the standard is so new, air districts' attainment status have not yet been designated. San Francisco and the Bay Area generally appear to have average annual levels right at the margin of attainment; San Francisco had annual average PM2.5 levels of 13.1 ug/m3 in 2002, and 10.1 ug/m3 in 2003. ("Bay Area Air Pollution Summary—2003," BAAQMD.) The three-year annual average in 2003 was 11.9 ug/m3. For comparison, the three-year annual average for San Jose Tully Road was 11.8 ug/m3; for Concord 11.4 ug/m3; for Livermore 12.3 ug/m3. (*Ibid.*) Compared to most other air basins, Bay Area PM2.5 levels are markedly lower. (2004 Air Almanac, p. 81.)

Direct PM2.5 emissions from stationary sources (including power plants) have decreased in recent years, while "Area-wide Sources" (primarily fugitive dust) have increased slightly. (2004 Air Almanac, p. 153.) Motor vehicle emissions are decreasing due to more stringent emission standards and clean fuel requirements. (*Ibid.*) According to the air district, overall direct emissions are "declining slightly between 1975 and 2010." (*Ibid.*) However, emissions have actually increased slightly since 2000.

More attention is being focused on particulate emissions, and those districts that are not in attainment with the new federal standards will be required to prepare attainment plans for CARB and EPA approval. In the meantime, the air district may continue to support voluntary local programs to support abatement of sources such as woodsmoke. In addition, new legislation enacted in the 2003 legislative session (SB 656) will require CARB, in consultation with the air districts, to develop and adopt a list of the most readily available, feasible, and cost-effective control measures that could be employed by CARB and the air districts to reduce PM10 and PM2.5. The goal of this legislation is to make progress toward attainment of the new state and federal particulate standards. The new legislation requires CARB and the air districts to adopt implementation

schedules for appropriate measures by July 31, 2005. CARB's measures focus on diesel PM reduction as well as continuing programs to reduce particulate precursor emissions. Air districts are looking at a variety of other control options.

Staff's cumulative impact assessment is comprised of three types of analyses. The first is a summary of projections of criteria pollutants by the responsible air agencies, including the air district and CARB. The second, which follows, is an analysis of the project's "localized cumulative impacts"—the project's direct emissions when combined with other major local emissions sources (i.e., other San Francisco electric generation facilities emissions). Finally, staff provides a discussion of secondary pollutant impacts, particularly for ozone and PM.

Localized Cumulative Impacts

To evaluate the direct emission impacts of the project along with other probable future projects, staff needs specific information that is included when project applicants file an application with the District for a permit. Projects located up to six miles from the proposed facility usually need to be included in the analysis. The City has provided a cumulative impact analysis (SFERP2005f, App. F), which includes three facilities that are under construction. They are SF Self Storage, SF Wave Exchange, and the University of California San Francisco. In addition to the emissions from these three facilities, the City also conducted an analysis, which for conservative estimates, includes future operation scenarios of the Potrero and Hunter Point power plants.

Table 8.1F-5 (SFERP2005f) provides a summary of the possible cumulative impacts the project, in combination with other projects (Hunter Point, Potrero, SF Self Storage, SF Wave Exchange, and UCSF), can exert in the area. The results of the analysis show that the PM10 cumulative impacts of the project and others on the area can be significant. Again, if the City's proposed local area PM10 mitigation measures are successfully carried out (see **OPERATIONAL IMPACT MITIGATION** Section), staff believes that the impacts contributed by this facility can be mitigated to a level of less than significant.

Secondary Pollutant Impacts

Ozone Impacts

The proposed project's gaseous emissions, primarily NO_x and VOC, can contribute to the formation of ozone. There are air dispersion models that can be used to quantify ozone impacts, but they are only appropriate for use in regional air quality planning efforts where numerous sources are input into the model to determine the regional ozone impacts. There are no regulatory agency models approved for assessing single source ozone impacts. However, because of the known relationship of NO_x and VOC emissions to ozone formation, staff believes that the emissions of NO_x and VOC from the project do have the potential to contribute to higher ozone levels if not mitigated. The City has proposed to mitigate the project's contribution to the area's ozone violations with a

combination of NO_x and VOC emission reduction credits from the San Francisco area. Staff believes that the provided emission reductions are in sufficient quantity to mitigate the proposed project's ozone impact.

Secondary PM2.5 Impacts

The project's NO_x, VOC, NH_3, and SO_x emissions can contribute to the formation of secondary fine particulate matter, namely organic condensable, nitrate and sulfate particulate matter.

Organic Condensable PM2.5

Not all volatile organic compounds can form secondary PM2.5. VOC with six or less carbon atoms in the chain will not participate in the formation of the carbon based PM2.5. The project's VOC emissions would be in the form of unburned natural gas, mostly methane and ethane, which contain only one and two carbon atoms, respectively. Thus, the turbine exhaust is not expected to emit any significant amounts of VOC that can participate in the formation of secondary PM2.5. Therefore, the project organic condensable impact is not significant.

Ammonia, Nitrate and Sulfate PM2.5

Staff believes that the project's ammonia, SO_x and NO_x emissions have a potential to contribute to ammonium sulfate and ammonium nitrate formation. As mentioned earlier in the **SETTINGS** section, such secondary PM would worsen the violations of the state 24-hour and annual PM10 standards and the federal 24-hour PM2.5 standard. Available research (Spicer, 1982) indicates that the conversion of NO_x to nitrate is approximately between 10 to 30 percent per hour in a polluted urban area where ozone and ammonia are present in sufficient amounts to participate in the reaction.

Other research (ARB, 2002) also shows that secondary ammonium nitrate (formed by NO_x and ammonia) can account for over half of the wintertime PM2.5 mass during the winter at most of the urban sites in California.

Ambient concentration data collected at the site (see **AIR QUALITY FIGURE 6**) shows that secondary particulate nitrates account for about 5 to 40 percent of the total mass of PM2.5 in the area. The same data also show that secondary particulate sulfates account for about 5 to 70 percent of total mass of PM2.5 in the area. On the other hand, the secondary particulate ammonium only accounts for about one to five percent of the total mass of PM2.5.

The ammonia emissions from the project would come from the NOx emissions control (SCR) system as ammonia, or ammonia slip, passing through the system unreacted. While the unreacted ammonia is a necessary by-product of the NOx control system, staff encourages the City to limit the ammonia slip emissions to the lowest extent possible while maintaining the NOx emission limits. CARB has indicated that local air pollution or air quality management districts consider recommending an ammonia slip emission limit of 5 ppm for gas turbines using

SCR to control NOx emissions (CARB 1999). For large frame turbines with effective dry low NOx combustor, staff agrees with the CARB recommendation; however, for this project, using aero-derivative turbines running in simple cycle mode, staff considers the City proposed 10 ppm ammonia slip emission limit to be acceptable.

The City proposes to mitigate the project's PM2.5 emission contribution by providing an offset package that includes emission reduction credits and implementing local programs to benefit the local area air quality. The package includes 48 TPY of NOx emission reduction credits and local mitigation programs, such as high-efficiency street sweeping, replacement or modification of existing wood stoves and fireplaces, or providing additional SOx emission reduction credits. Because the amount of NOx emission reduction credits are higher than the project's NOx emissions and the local mitigation program would fully offset the project's PM2.5 emissions, staff believes the City's proposed mitigation package would mitigate the project's PM2.5 impacts to a level of less than significant.

Greenhouse Gas Reporting

In addition to regulated criteria pollutants, the combustion of natural gas produces air emissions known as greenhouse gases. These include primarily carbon dioxide and methane (unburned natural gas). Greenhouse gases are known to contribute to the warming of the earth's atmosphere. Climate change from rising temperatures represents a risk to California's economy, public health, and environment due to changes in sea levels that could lead to flooding of coastal communities, drought, forest fires, decline of fish populations, reduced hydropower opportunities, and loss of habitat. In 1998, the Energy Commission identified a range of strategies to prepare for an uncertain climate future, including a need to account for the environmental impacts associated with energy production, planning, and procurement (CEC 1998, p.5). In 2003, the Energy Commission recommended that the state should require reporting of greenhouse gas emissions as a condition of state licensing of new electric generating facilities (CEC 2003, p. 42). Staff recommends Condition of Certification **AQ-SC9,** which requires the project owner to report the quantities of greenhouse gas emissions, calculated as carbon dioxide (CO_2-eq) equivalent, emitted as a result of facility operation. Such reporting would be done in accordance with accepted reporting protocol as specified.

COMPLIANCE WITH LORS

FEDERAL

The District issued a Preliminary Determination of Compliance (PDOC) on July 26, 2005. The applicant is also required to submit an application to the District for a Major Facility Review Permit (Title V) prior to commencing operation. The applicant is also restricted from commencing operation unless a Title IV Permit

has been issued, or 24 months after submitting an acid rain application (Title IV) to the District, whichever is earlier. Compliance with both of these federal titles is expected, and will be determined at a later date.

STATE

Staff believes that the operation of the project, after the implementation of staff recommended mitigation measures, and the District recommended conditions specified in the PDOC (**AQ-1** to **42**), would comply with all applicable state LORS.

LOCAL

The District has issued a PDOC, which states that the proposed project is expected to comply with all applicable District rules and regulations, and that offsets will be provided prior to the issuance of the project Authority to Construct permit.

NOTEWORTHY PUBLIC BENEFITS

The City plans to operate local monitoring stations prior to SFERP operation that would collect information on air quality and provide a basis to address community concerns related to the possible need for further mitigation measures. One of these monitoring stations is located in Whitney Young Circle at Hudson and Progress streets and has already began collecting data on criteria and toxic air pollutants in the Hunters Point community (the station is planned to operate for approximately 12 months). Two other monitoring stations are planed to be located in the Potrero Hill and Dogpatch neighborhoods. Data collected from these local stations would be compared with data collected from the BAAQMD Arkansas Street monitoring station to determine if there are any significant local variations in air quality. Depending on the data obtained from these stations, the City may continue to monitor the air quality in the southeast part of the City after SFERP start-up.

In addition to the above, it is noteworthy that one of the project objectives of SFERP is to enable the shutdown of Hunters Point Units 1 and 4. The City has been in discussion with the Independent System Operator (Cal ISO) regarding the prerequisites to such a shutdown and the factors that would lead to the termination of the Reliabity Must Run (RMR) contracts for the Mirant Potrero generation facility. This process is still evolving but it appears increasingly likely that the Hunters Point Units will shut down as a result of these efforts in the approximate time frame that SFERP comes on-line. The Hunters Point units have been a community health concern for many years. The final closure of these units will constitute a benefit to the surrounding community and the air basin by removing this concern.

CONCLUSIONS

The project emissions would be fully offset, and the project would incorporate BACT in accordance with the District NSR requirements.

The project would not cause new violations of any NO_2, SO_2, or CO ambient air quality standards, and therefore, its NO_x, SO_x and CO emission impacts are not significant.

The project NO_x and VOC emissions can contribute to the existing violations of the state and the federal 1-hour ozone air quality standards. However, staff has determined that the required mitigation (in the form of emission reduction credits) would mitigate the project's impact to a level that is less than significant.

Staff recommends the addition of nine additional restrictions on construction activities, which are described in Conditions of Certification **AQ-SC1 to AQ-SC5**. Staff believes that with this addition, the project's construction impacts from PM10 and PM2.5 emissions would be mitigated to a level that is less than significant.

Staff recommends the addition of three Conditions of Certification **AQ-SC6** to **AQ-SC8** to enhance staff in tracking the construction and operation of the project.

Staff recommends the addition of Condition of Certification **AQ-SC9** to require greenhouse gas reporting.

Staff recommends the addition of three Conditions of Certification **AQ-SC10** to **AQ-SC12** (local PM2.5 emissions mitigation measures) to mitigate the project's PM2.5 emission impacts to a level that is less than significant.

PROPOSED CONDITIONS OF CERTIFICATION

AQ-SC1 Air Quality Construction Mitigation Manager (AQCMM): The project owner shall designate and retain an on-site AQCMM who shall be responsible for directing and documenting compliance with conditions AQ-SC3, AQ-SC4 and AQ-SC5 for the entire project site and linear facility construction. The on-site AQCMM may delegate responsibilities to one or more AQCMM Delegates. The AQCMM and AQCMM Delegates shall have full access to all areas of construction on the project site and linear facilities, and shall have the authority to stop any or all construction activities as warranted by applicable construction mitigation conditions. The AQCMM and AQCMM Delegates may have other responsibilities in addition to those described in this condition. The AQCMM shall not be terminated without written consent of the CPM.

Verification: At least 60 days prior to the start of ground disturbance, the project owner shall submit to the CPM for approval, the name, resume, qualifications, and contact information for the on-site AQCMM and all AQCMM Delegates. The AQCMM and all Delegates must be approved by the CPM before the start of ground disturbance.

AQ-SC2 Air Quality Construction Mitigation Plan (AQCMP): The project owner shall provide an AQCMP, for approval, which details the steps that will be taken and the reporting requirements necessary to ensure compliance with conditions AQ-SC3, AQ-SC4 and AQ-SC5.

Verification: At least 60 days prior to the start of any ground disturbance, the project owner shall submit the AQCMP to the CPM for approval. The CPM will notify the project owner of any necessary modifications to the plan within 30 days from the date of receipt.

AQ-SC3 Construction Fugitive Dust Control: The AQCMM shall submit documentation to the CPM in each Monthly Compliance Report (MCR) that demonstrates compliance with the following mitigation measures for the purposes of preventing all fugitive dust plumes from leaving the Project. Any deviation from the following mitigation measures shall require prior CPM notification and approval.

a) All unpaved roads and disturbed areas in the project and linear construction sites shall be watered as frequently as necessary to comply with the dust mitigation objectives of AQ-SC4. The frequency of watering can be reduced or eliminated during periods of precipitation.

b) No vehicle shall exceed 10 miles per hour within the construction site.

c) The construction site entrances shall be posted with visible speed limit signs.

d) All construction equipment vehicle tires shall be inspected and washed as necessary to be cleaned free of dirt prior to entering paved roadways.

e) Gravel ramps of at least 20 feet in length must be provided at the tire washing/cleaning station.

f) All unpaved exits from the construction site shall be graveled or treated to prevent track-out to public roadways.

g) All construction vehicles shall enter the construction site through the treated entrance roadways, unless an alternative route has been submitted to and approved by the CPM.

h) Construction areas adjacent to any paved roadway shall be provided with sandbags or other measures as specified in the Storm Water Pollution Prevention Plan (SWPPP) to prevent run-off to roadways.

i) All paved roads within the construction site shall be swept at least twice daily (or less during periods of precipitation) on days when construction activity occurs to prevent the accumulation of dirt and debris.

j) At least the first 500 feet of any public roadway exiting from the construction site shall be swept at least twice daily (or less during periods of precipitation) on days when construction activity occurs or on any other day when dirt or runoff from the construction site is visible on the public roadways.

k) All soil storage piles and disturbed areas that remain inactive for longer than 10 days shall be covered, or shall be treated with appropriate dust suppressant compounds.

l) All vehicles that are used to transport solid bulk material on public roadways and that have potential to cause visible emissions shall be provided with a cover, or the materials shall be sufficiently wetted and loaded onto the trucks in a manner to provide at least one foot of freeboard.

m) Wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) shall be used on all construction areas that may be disturbed. Any windbreaks installed to comply with this condition shall remain in place until the soil is stabilized or permanently covered with vegetation.

n) Construction areas adjacent to any public accessible roadway shall be provided with an eight foot high temporary fence. This fence should be lined with material (such as solid construction tarp) to prevent transport of fugitive dust to publicly accessible areas. This

fence can be removed after the end of the facility's construction period.

Verification: The project owner shall include in the MCR (1) a summary of all actions taken to maintain compliance with this condition, (2) copies of any complaints filed with the air district in relation to project construction, and (3) any other documentation deemed necessary by the CPM and AQCMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.

AQ-SC4 Dust Plume Response Requirement: The AQCMM or an AQCMM Delegate shall monitor all construction activities for visible dust plumes. Observations of visible dust plumes that have the potential to be transported (1) off the project site or (2) 200 feet beyond the centerline of the construction of linear facilities or (3) within 100 feet upwind of any regularly occupied structures not owned by the project owner indicate that existing mitigation measures are not resulting in effective mitigation. The AQCMM or Delegate shall implement the following procedures for additional mitigation measures in the event that such visible dust plumes are observed:

Step 1: The AQCMM or Delegate shall direct more intensive application of the existing mitigation methods within 15 minutes of making such a determination.

Step 2: The AQCMM or Delegate shall direct implementation of additional methods of dust suppression if step 1 specified above fails to result in adequate mitigation within 30 minutes of the original determination.

Step 3: The AQCMM or Delegate shall direct a temporary shutdown of the activity causing the emissions if step 2 specified above fails to result in effective mitigation within one hour of the original determination. The activity shall not restart until the AQCMM or Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the shutdown source. The owner/operator may appeal to the CPM any directive from the AQCMM or Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Verification: The AQCMP shall include a section detailing how the additional mitigation measures will be accomplished within the time limits specified.

AQ-SC5 Diesel-Fueled Engines Control: The AQCMM shall submit to the CPM, in the Monthly Compliance Report (MCR), a construction mitigation report that demonstrates compliance with the following mitigation measures for the purposes of controlling diesel construction-related

emissions. Any deviation from the following mitigation measures shall require prior CPM notification and approval.

a) All diesel-fueled engines used in the construction of the facility shall be fueled only with ultra-low sulfur diesel, which contains no more than 15 ppm sulfur.

b) All diesel-fueled engines used in the construction of the facility shall have clearly visible tags issued by the on-site AQCMM showing that the engine meets the conditions set forth herein.

c) All construction diesel engines, which have a rating of 100 hp or more, shall meet, at a minimum, the Tier 2 California Emission Standards for Off-Road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, section 2423(b)(1) unless certified by the on-site AQCMM that such engine is not available for a particular item of equipment. In the event a Tier 2 engine is not available for any off-road engine larger than 100 hp, that engine shall be equipped with a Tier 1 engine. In the event a Tier 1 engine is not available for any off-road engine larger than 100 hp, that engine shall be equipped with a catalyzed diesel particulate filter (soot filter), unless certified by engine manufacturers or the on-site AQCMM that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices is "not practical" if, among other reasons:

   (1) There is no available soot filter that has been certified by either the California Air Resources Board or U.S. Environmental Protection Agency for the engine in question; or

   (2) The construction equipment is intended to be on-site for ten (10) days or less.

   (3) The CPM may grant relief from this requirement if the AQCMM can demonstrate that they have made a good faith effort to comply with this requirement and that compliance is not possible.

d) The use of a soot filter may be terminated immediately if one of the following conditions exists, provided that the CPM is informed within ten (10) working days of the termination:

   (1) The use of the soot filter is excessively reducing normal availability of the construction equipment due to increased downtime for maintenance, and/or reduced power output due to an excessive increase in backpressure.

   (2) The soot filter is causing or is reasonably expected to cause significant engine damage.

(3) The soot filter is causing or is reasonably expected to cause a significant risk to workers or the public.

(4) Any other seriously detrimental cause which has the approval of the CPM prior to the termination being implemented.

e) All heavy earthmoving equipment and heavy duty construction related trucks with engines meeting the requirements of (c) above shall be properly maintained and the engines tuned to the engine manufacturer's specifications.

f) All diesel heavy construction equipment shall not remain running at idle for more than five minutes, to the extent practical.

Verification: The project owner shall include in the MCR (1) a summary of all actions taken to maintain compliance with this condition, (2) copies of all diesel fuel purchase records, (3) a list of all heavy equipment used on site during that month, including the owner of that equipment and a letter from each owner indicating that equipment has been properly maintained, and (4) any other documentation deemed necessary by the CPM and AQCMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.

AQ-SC6 The project owner shall submit to the CPM for review and approval any modification proposed by the project owner to any project air permit. The project owner shall submit to the CPM any modification to any permit proposed by the District or U.S. EPA, and any revised permit issued by the District or U.S. EPA, for the project.

Verification: The project owner shall submit any proposed air permit modification to the CPM within five working days of its submittal either by 1) the project owner to an agency, or 2) receipt of proposed modifications from an agency. The project owner shall submit all modified air permits to the CPM within 15 days of receipt.

AQ-SC7 The project owner shall surrender the emission offset credits certificate number 896 at the time that surrender is required by condition **AQ-38**. The project owner may request CPM approval for any substitutions or modification of credits. The CPM, in consultation with the District, may approve any such change to the ERC list provided that the project remains in compliance with all applicable laws, ordinances, regulations, and standards, the requested change(s) clearly will not cause the project to result in a significant environmental impact, and each requested change is consistent with applicable federal and state laws and regulations.

Verification: The project owner shall submit to the CPM a list of ERCs to be surrendered to the District at least 60 days prior to initial startup. If the CPM, in consultation with the District, approves a substitution or modification, the CPM shall file a statement of the approval with the commission docket and mail a copy

of the statement to every person on the post-certification mailing list. The CPM shall maintain an updated list of approved ERCs for the project.

AQ-SC8 The project owner shall comply with all staff (AQ-SC) and district (AQ) Conditions of Certification. The CPM, in consultation with the District, may approve as an insignificant change, any change to an air quality Condition of Certification, provided that: (1) the project remains in compliance with all applicable laws, ordinances, regulations, and standards, (2) the requested change clearly will not cause the project to result in a significant environmental impact, (3) no additional mitigation or offsets will be required as a result of the change, (4) no existing daily, quarterly, or annual permit limit will be exceeded as a result of the change, and (5) no increase in any daily, quarterly, or annual permit limit will be necessary as a result of the change.

Verification: The project owner shall notify the CPM in writing of any proposed change to a condition of certification pursuant to this condition and shall provide the CPM with any additional information the CPM requests to substantiate the basis for approval.

AQ-SC9 The project owner shall report to the CPM the quantity of greenhouse gas emissions, calculated as CO_2 equivalent, emitted on an annual basis as a direct result of facility electricity production.

Verification: Any greenhouse gas emissions that are reported by the project owner to the California Climate action Registry or pursuant to this condition shall be reported to the CPM as part of the fourth Quarterly Air Quality Report.

AQ-SC10 For as long as the project is in operation, the project owner shall provide daily street cleaning services using high-efficiency street sweepers for a total of no less than 9.6 miles of Third, Cesar Chavez, 16th, Illinois, Tennessee, Evans, 23rd, 25 streets and Pensylvania Ave.

Verification: The project owner shall keep daily records of the street sweeping activities and shall submit to the CPM the quarterly and annual compliance reports as required by Condition 20.

AQ-SC11 The project owner shall provide additional 5 TPY of PM2.5 emission reduction credits by subsidizing the replacement or modification (blocking chimneys) of wood stoves or fireplaces.

Verification: At least 30 days prior to the start of any site clearing or ground disturbance activities, the project owner shall provide the CPM, for approval, a final plan to acquire 5 TPY of PM2.5 emission reduction credits. The wood stove and fireplace replacement or modification programs must start after the plan approval, and no later than 60 days prior to initial startup.

AQ-SC12 In lieu of compliance with Condition **AQ-SC11**, the project owner shall provide 45 TPY of SOx emission reduction credits acquired in the local Hunters Point and/or Potrero areas to provide an annual equivalent of 15 TPY of PM2.5.

Verification: The project owner shall submit to the CPM a list of ERCs to be surrendered to the District at least 60 days prior to initial startup.

DISTRICT CONDITIONS OF CERTIFICATION

Permit Conditions

Definitions:

Clock Hour:	Any continuous 60-minute period beginning on the hour.
Calendar Day:	Any continuous 24-hour period beginning at 12:00 AM or 0000 hours.
Year:	Any consecutive twelve-month period of time
Heat Input:	All heat inputs refer to the heat input at the higher heating value (HHV) of the fuel, in Btu/scf.
Rolling 3-hour period:	Any three-hour period that begins on the hour and does not include start-up or shutdown periods.
Firing Hours:	Period of time during which fuel is flowing to a unit, measured in fifteen-minute increments.
MM Btu:	million British thermal units
Gas Turbine Start-up Mode:	The lesser of the first 120 minutes of continuous fuel flow to the Gas Turbine after fuel flow is initiated or the period of time from Gas Turbine fuel flow initiation until the Gas Turbine achieves two consecutive CEM data points in compliance with the emission concentration limits of conditions 20(b) and 20(d).
Gas Turbine Shutdown Mode:	The lesser of the 30 minute period immediately prior to the termination of fuel flow to the Gas Turbine or the period of time from non-compliance with any requirement listed in Conditions 20(b) through 20(d) until termination of fuel flow to the Gas Turbine.
Specified PAHs:	The polycyclic aromatic hydrocarbons listed below shall be considered to Specified PAHs for these permit conditions. Any emission limits for Specified PAHs refer to the sum of the emissions for all six of the following compounds. Benzo[a]anthracene Benzo[b]fluoranthene Benzo[k]fluoranthene Benzo[a]pyrene Dibenzo[a,h]anthracene Indeno[1,2,3-cd]pyrene
Corrected Concentration:	The concentration of any pollutant (generally NO_x, CO, or NH_3) corrected to a standard stack gas oxygen concentration. For emission point P-1 (exhaust stack of S-1 Gas Turbine), emission point P-2 (exhaust stack of S-2 Gas Turbine) and P-3 (exhaust stack of S-3 Gas Turbine) the standard stack gas oxygen concentration is 15% O_2 by volume on a dry basis.

Commissioning Activities:	All testing, adjustment, tuning, and calibration activities recommended by the equipment manufacturers and the SFERP construction contractor to insure safe and reliable steady state operation of the gas turbines, heat recovery steam generators, steam turbine, and associated electrical delivery systems.
Commissioning Period:	The Period shall commence when all mechanical, electrical, and control systems are installed and individual system start-up has been completed, or when a gas turbine is first fired, whichever occurs first. The period shall terminate when the plant has completed performance testing, is available for commercial operation, and has initiated sales to the power exchange.
Precursor Organic Compounds (POCs):	Any compound of carbon, excluding methane, ethane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate
CEC CPM:	California Energy Commission Compliance Program Manager
SFERP:	San Francisco Electric Reliability Project

Conditions for the Commissioning Period

AQ-1 The owner/operator of the SFERP shall minimize emissions of carbon monoxide and nitrogen oxides from S-1, S-2, and S-3, Gas Turbine Combustors to the maximum extent possible during the commissioning period. Conditions 1 through 12 will only apply during the commissioning period as defined above. Unless otherwise indicated, Conditions 13 through 42 will apply after the commissioning period has ended.

Verification: The project owner shall submit a monthly compliance report to the CPM specifying how this condition is being complied with.

AQ-2 At the earliest feasible opportunity, in accordance with the recommendations of the equipment manufacturers and the construction contractor, the owner/operator shall ensure that S-1, S-2, and S-3, Gas Turbine Combustors are tuned to minimize the emissions of carbon monoxide and nitrogen oxides.

Verification: The project owner shall submit a monthly compliance report to the CPM specifying how this condition is being complied with.

AQ-3 At the earliest feasible opportunity, in accordance with the recommendations of the equipment manufacturers and the construction contractor, the owner/operator shall install, adjust, and operate A-1 through A-6, SCR and Oxidation Systems, to minimize the emissions of carbon monoxide and nitrogen oxides from S-1, S-2, and S-3, Gas Turbine Combustors.

Verification: The project owner shall submit a monthly compliance report to the CPM specifying how this condition is being complied with.

AQ-4 Coincident with the as-designed operation of A-1 thru A-6, SCR and Oxidation Systems, pursuant to Parts 3, 8, 9 and 10 of this condition, the owner/operator shall ensure that the Gas Turbine Combustors (S-1, S-2, and S-3) comply with the NO_x and CO emission limitations specified in Parts 20(a) through 20(d) of this condition.

Verification: The project owner shall submit a monthly compliance report to the CPM specifying how this condition is being complied with.

AQ-5 The owner/operator of the SFERP shall prepare a plan describing the procedures to be followed during the commissioning of the gas turbines. The plan shall be submitted the District Engineering Division and the CEC CPM at least four weeks prior to first firing of S-1, S-2, or S-3, Gas Turbine Combustors. The plan shall include a description of each commissioning activity, the anticipated duration of each activity in hours, and the purpose of the activity. The activities described shall

include, but not be limited to, the tuning of the Water Injection system, the installation and operation of the SCR systems and oxidation catalysts, the installation, calibration, and testing of the CO and NO_x continuous emission monitors, and any activities requiring the firing of the Gas Turbine Combustors (S-1, S-2, and S-3) without abatement by their respective SCR and Oxidation Systems. No Gas Turbine Combustor (S-1, S-2, or S-3) shall be fired sooner than 28 days after the District receives the commissioning plan.

Verification: The project owner shall submit a monthly compliance report to the CPM specifying how this condition is being complied with.

AQ-6 During the commissioning period, the owner/operator of the SFERP shall demonstrate compliance with Conditions 8 through 11 of this condition through the use of properly operated and maintained continuous emission monitors and data recorders for the following parameters:

- firing hours for each gas turbine (S-1, S-2, and S-3)
- fuel flow rates to each train
- stack gas nitrogen oxide emission concentrations at P-1, P-2, and P-3
- stack gas carbon monoxide emission concentrations P-1, P-2, and P-3
- stack gas oxygen or carbon dioxide concentrations P-1, P-2, and P-3

The owner/operator shall monitor the parameters and record at least once every 15 minutes (excluding normal calibration periods or when the monitor source is not in operation) for the Gas Turbine Combustors (S-1, S-2, and S-3). The owner/operator shall use District-approved methods to calculate heat input rates, NO_x (as NO_2) mass emission rates, carbon monoxide mass emission rates, and NO_x and CO emission concentrations, summarized for each clock hour and each calendar day. All records shall be retained on site for at least 5 years from the date of entry and made available to District personnel upon request.

Verification: The project owner shall submit a monthly compliance report to the CPM specifying how this condition is being complied with.

AQ-7 The owner/operator shall install, calibrate, and properly operate District-approved continuous emission monitors specified in Condition 6 prior to the first firing of the Gas Turbine Combustors (S-1, S-2, and S-3). After first firing of the turbines, the detection range of these continuous emission monitors must be adjusted as necessary to

accurately measure the resulting range of CO and NO_x emission concentrations. The type, specifications, and location of these monitors shall be subject to District review and approval (by the District's Source Test Section).

Verification: The project owner shall submit a monthly compliance report to the CPM specifying how this condition is being complied with. In addition, the project owner shall provide evidence of the District's approval of the emission monitoring system to the CPM prior to first firing of the gas turbines.

AQ-8 The owner/operator shall not exceed 100 hours of firing during the commissioning period of S-1, Gas Turbine Combustor without abatement of nitrogen oxide emissions by A-1, SCR System. Such operation of S-1, Gas Turbine Combustor without abatement shall be limited to discrete commissioning activities that can only be properly executed without the SCR or Oxidation Catalyst Systems fully operational. Upon completion of these activities, the owner/operator shall provide written notice to the District's Engineering and Enforcement Divisions, and the unused balance of the 100 firing hours without abatement shall expire.

Verification: The project owner shall submit a monthly compliance report to the CPM specifying how this condition is being complied with.

AQ-9 The owner/operator shall not exceed 100 hours of firing during the commissioning period of S-2, Gas Turbine Combustor without abatement of nitrogen oxide emissions by A-3, SCR System. Such operation of S-2, Gas Turbine Combustor without abatement shall be limited to discrete commissioning activities that can only be properly executed without the SCR or Oxidation Catalyst Systems fully operational. Upon completion of these activities, the owner/operator shall provide written notice to the District's Engineering and Enforcement Divisions, and the unused balance of the 100 firing hours without abatement shall expire.

Verification: The project owner shall submit a monthly compliance report to the CPM specifying how this condition is being complied with.

AQ-10 The owner/operator shall not exceed 100 hours of firing during the commissioning period of S-3, Gas Turbine Combustor without abatement of nitrogen oxide emissions by A-5, SCR System. Such operation of S-3, Gas Turbine Combustor without abatement shall be limited to discrete commissioning activities that can only be properly executed without the SCR or Oxidation Catalyst Systems fully operational. Upon completion of these activities, the owner/operator shall provide written notice to the District Engineering and Enforcement Divisions. and the unused balance of the 100 firing hours without abatement shall expire.

Verification: The project owner shall submit a monthly compliance report to the CPM specifying how this condition is being complied with.

AQ-11 The owner/operator shall calculate the total mass emissions of nitrogen oxides, carbon monoxide, precursor organic compounds, PM10, and sulfur dioxide that are emitted by each Gas Turbine Combustor (S-1, S-2, and S-3) during the commissioning period. These emissions count towards the consecutive twelve-month emission limitations specified in Condition 23 of this condition.

Verification: The project owner shall submit in the monthly compliance report to the CPM specifying how this condition is being complied with.

AQ-12 Prior to the end of the Commissioning Period, the owner/operator shall conduct a District- and CEC-approved source test using external continuous emission monitors to determine compliance with Condition 18 of this condition. The source test shall determine NO_x, CO, and POC emissions during start-up and shutdown of the gas turbines. The POC emissions shall be analyzed for methane and ethane to account for the presence of unburned natural gas. The source test shall include a minimum of three start-up and three shutdown periods. No later than twenty working days before the execution of the source tests, the owner/operator shall submit to the District and the CEC Compliance Program Manager (CPM) a detailed source test plan designed to satisfy the requirements of this condition. The District and the CEC CPM will notify the owner/operator of any necessary modifications to the plan within 20 working days of receipt of the plan; otherwise, the plan shall be deemed approved. The owner/operator shall incorporate the District and CEC CPM comments into the test plan. The owner/operator shall notify the District and the CEC CPM within seven (7) working days prior to the planned source testing date. Source test results shall be submitted to the District and the CEC CPM within 30 days of the source testing date.

Verification: No later than 30 working days before the commencement of the source tests, the project owner shall submit to the District and the CPM a detailed source test plan designed to satisfy the requirements of this condition. The District and the CPM will notify the project owner of any necessary modifications to the plan within 20 working days of receipt of the plan; otherwise, the plan shall be deemed approved. The project owner shall incorporate the District and CPM comments into the test plan. The project owner shall notify the District and the CPM within seven (7) working days prior to the planned source testing date. Source test results shall be submitted to the District and the CPM within 90 days of the source testing date.

Conditions for the Gas Turbine Combustors (S-1, S-2, and S-3)

AQ-13 The owner/operator shall ensure that S-1, S-2 and S-3 gas turbine combustors are fired on PUC natural gas exclusively. (Basis: BACT for SO_2 and PM10)

Verification: The project owner shall complete, on a daily basis, a laboratory analysis showing the sulfur content of natural gas being burned at the facility. The daily sulfur analysis reports shall be incorporated into the quarterly compliance reports.

AQ-14 The owner/operator shall ensure that heat input rate to each Gas Turbine Combustor (S-1, S-2, and S-3) does not exceed 487.3 MM Btu per hour, averaged over one hour period. (Basis: 2-1-234)

Verification: As part of the quarterly and annual compliance reports, the project owner shall include information on the date, time, and duration of any violation of this permit condition.

AQ-15 Except during the commissioning period, the owner/operator of S-1, Gas Turbine Combustor shall properly operate and properly maintain A-1, Selective Catalytic Reduction (SCR) and A-2, Oxidation Catalyst Systems whenever fuel is combusted at the source and the A-1 catalyst bed has reached minimum operating temperature. (Basis: BACT for NO_x and CO)

Verification: As part of the quarterly and annual compliance reports, the project owner shall include information on the date, time, and duration of any violation of this permit condition.

AQ-16 Except during the commissioning period, the owner/operator of S-2, Gas Turbine Combustor shall properly operate and properly maintain A-3, Selective Catalytic Reduction (SCR) and A-4, Oxidation Catalyst Systems whenever fuel is combusted at those sources and the A-3 catalyst bed has reached minimum operating temperature. (Basis: BACT for NO_x and CO)

Verification: As part of the quarterly and annual compliance reports, the project owner shall provide information on any major problem in the operation of the Oxidizing Catalyst and Selective Catalytic Reduction Systems for the Gas Turbines and HRSGs. The information shall include, at a minimum, the date and description of the problem and the steps taken to resolve the problem.

AQ-17 Except during the commissioning period, the owner/operator of S-3, Gas Turbine Combustor shall properly operate and properly maintain A-5, Selective Catalytic Reduction (SCR) and A-6, Oxidation Catalyst Systems whenever fuel is combusted at the source and the A-5 catalyst bed has reached minimum operating temperature. (Basis: BACT for NO_x and CO)

Verification: As part of the quarterly and annual compliance reports, the project owner shall provide information on any major problem in the operation of the Oxidizing Catalyst and Selective Catalytic Reduction Systems for the Gas Turbines and HRSGs. The information shall include, at a minimum, the date and description of the problem and the steps taken to resolve the problem.

AQ-18 The owner/operator of the Gas Turbine Combustors (S-1, S-2, and S-3) shall comply with requirements (a) through (h) below under all operating scenarios, except requirements (a) through (h) do not apply during a gas turbine start-up or shutdown. (Basis: BACT and Toxic Risk Management Policy)

(a) Nitrogen oxide mass emissions (calculated in accordance with District-approved methods) at each P-1, P-2, and P-3 (the exhaust point for each Gas Turbine abated by SCR and Catalyst Oxidation) shall not exceed or 0.0090 lb/MM Btu (HHV). (Basis: BACT for NO_x)

(b) The nitrogen oxide emission concentration at each P-1, P-2, and P-3 shall not exceed 2.5 ppmv, on a dry basis, corrected to 15% O_2, averaged over any rolling 1-hour period. (Basis: BACT for NO_x)

(c) Carbon monoxide mass emissions at each P-1, P-2, and P-3 shall not exceed 0.0089 lb/MM Btu (HHV) of natural gas fired, averaged over any rolling 3-hour period. (Basis: BACT for CO)

(d) The carbon monoxide emission concentration at each P-1, P-2, and P-3 shall not exceed 4 ppmv, on a dry basis, corrected to 15% O_2, averaged over any rolling 3-hour period. (Basis: BACT for CO)

(e) Ammonia (NH_3) emission concentrations at each P-1, P-2, and P-3 shall not exceed 10 ppmv, on a dry basis, corrected to 15% O_2, averaged over any one-hour period. The owner/operator shall verify, by continuous recording, the ammonia injection rate to A-1, A-3, and A-5, SCR Systems. The correlation between the gas turbine, A-1, A-3 and A-5, SCR System ammonia injection rates and the corresponding ammonia emission concentration at emission points P-1, P-2 and P-3 shall be determined in accordance with Part 25 of this condition. (Basis: TRMP for NH_3)

(f) Precursor organic compound (POC) mass emissions (as CH_4) at each P-1, P-2, and P-3 shall not exceed 0.0025 lb/MM Btu of natural gas fired. (Basis: BACT)

(g) Sulfur dioxide (SO_2) mass emissions at each P-1, P-2, and P-3 shall not exceed 0.0027 lb/MM Btu of natural gas fired. (Basis: BACT)

(h) Particulate matter (PM10) mass emissions at each P-1, P-2, and P-3 shall not exceed 3 pounds per hour. (Basis: BACT)

Verification: The project owner shall submit to the District and CPM, quarterly reports for the proceeding calendar quarter within 30 days from the end of the quarter. The report for the fourth quarter can be an annual compliance summary for the preceding year. The quarterly and annual compliance summary reports shall contain the following information:

(a) Operating parameters of emission control equipment, including but not limited to ammonia injection rate, NO_x emission rate and ammonia slip.

(b) Total plant operation time (hours), number of startups, hours in cold startup, hours in warm startup, hours in hot startup, and hours in shutdown.

(c) Date and time of the beginning and end of each startup and shutdown period.

(d) Average plant operation schedule (hours per day, days per week, weeks per year).

(e) All continuous emissions data reduced and reported in accordance with the District approved CEMS protocol.

(f) Maximum hourly, maximum daily, total quarterly, and total calendar year emissions of NO_x, CO, PM10, VOC and SO_x (including calculation protocol).

(g) Fuel sulfur content (monthly laboratory analyses, monthly natural gas sulfur content reports from the natural gas supplier(s), or the results of a custom fuel monitoring schedule approved by the District.

(h) A log of all excess emissions, including the information regarding malfunctions/breakdowns.

(i) Any permanent changes made in the plant process or production, which would affect air pollutant emissions, and indicate when changes were made.

(j) Any maintenance to any air pollutant control system (recorded on an as-performed basis).

In addition, this information shall be maintained on site for a minimum of five (5) years and shall be provided to District personnel on request.

AQ-19 The owner/operator shall not exceed the regulated air pollutant mass emission rates from each of the Gas Turbine Combustors (S-1, S-2, and S-3) during a start-up or a shutdown as established below. (Basis: BACT)

	Cold Start-Up (lb/hour)	**Shutdown (lb/hour)**
Oxides of Nitrogen (as NO_2)	40	40
Carbon Monoxide (CO)	10	10
Precursor Organic Compounds (as CH_4)	2	2

Verification: The project owner shall submit to the District and CPM the quarterly and annual compliance reports as required by Condition 18.

AQ-20 The owner/operator of the Gas Turbines (S-1, S-2 and S-3) shall not operate more than two startups and shutdowns per turbine in any one day. (Basis: Cumulative Increase)

Verification: The project owner shall submit to the District and CPM the quarterly and annual compliance reports as required by Condition 18.

AQ-21 The owner/operator shall ensure that the cumulative combined emissions from the Gas Turbine Combustors (S-1, S-2, and S-3) do not exceed the following limits during any consecutive twelve-month period, including emissions generated during gas turbine start-ups and shutdowns:

- 39.8 tons of NO_x (as NO_2) per rolling 365 day period;
- 27.9 tons of CO per rolling 365 day period;
- 7.7 tons of POC (as CH_4) per rolling 365 day period;
- 18 tons of PM10 per rolling 365 day period; and
- 2.7 tons of SO_2 per rolling 365 day period.

(Basis: Cumulative Increase)

Verification: The project owner shall submit to the District and CPM the quarterly and annual compliance reports as required by Condition 18.

AQ-22 The owner/operator shall ensure that the maximum projected annual toxic air contaminant emissions from the Gas Turbine Combustors (S-1, S-2, and S-3) not exceed the following limits:

- 2,110 pounds of formaldehyde per year
- 235 pounds of acetaldehyde per year
- 21 pounds of acrolein per year
- 19 pounds of benzene per year

unless the following requirement is satisfied:

The owner/operator shall perform a health risk assessment using the emission rates determined by annual source test and the most current Bay Area Air Quality Management District-approved procedures and unit risk factors in effect at the time of the analysis. This risk analysis shall be submitted to the District and the CEC CPM within 60 days of the source test date. The owner/operator may request that the District and the CEC CPM revise the carcinogenic compound emission limits specified above. If the owner/operator demonstrates to the satisfaction

of the APCO that these revised emission limits will result in a cancer risk of not more than 1.0 in one million, the District and the CEC CPM may, at their discretion, adjust the carcinogenic compound emission limits listed above. (Basis: TRMP)

Verification: The project owner shall submit to the District and CPM the quarterly and annual compliance reports as required by Condition 18.

AQ-23 The owner/operator shall demonstrate compliance with Conditions 14 through 15, 18(a) through 18(d), 19, 21(a), and 21(b) by using properly operated and maintained continuous monitors (during all hours of operation including equipment start-up and shutdown periods) for all of the following parameters in (a) through (d) below.

(a) Firing Hours and Fuel Flow Rates for each of the following sources: S-1, S-2, and S-3 combined.

(b) Carbon Dioxide (CO2) or Oxygen (O2) concentrations, Nitrogen Oxides (NOx) concentrations, and Carbon Monoxide (CO) concentrations at each of the following exhaust points: P-1, P-2, and P-3.

(c) Ammonia injection rate at A-1, A-3, and A-5, SCR Systems

(d) Water or steam injection rate at S-1, S-2, and S-3 Gas Turbine Combustors

The owner/operator shall record all of the above parameters measured in (a) though (d) every 15 minutes (excluding normal calibration periods) and shall summarize all of the above parameters for each clock hour. For each calendar day, the owner/operator shall calculate and record the total firing hours, the average hourly fuel flow rates, and average hourly pollutant emission concentrations. (Basis: District Regulations 1-520.1, 9-9-501, BACT, Offsets, Cumulative Increase)

Verification: At least 30 days before first fire, the project owner shall submit to the CPM a plan on how the measurements and recordings required by this condition will be performed.

AQ-24 The owner/operator shall use the parameters measured in Condition 23(a) through (d) and District-approved calculation methods to calculate the parameters below.

(a) Heat Input Rate for each of the following sources: S-1, S-2, and S-3.

(b) Corrected NOx concentrations, NOx mass emissions (as NO_2), corrected CO concentrations, and CO mass emissions at each of the following exhaust points: P-1, P-2, and P-3.

Applicable to emission points P-1, P-2, and P-3, the owner/operator shall record the parameters specified above at least once every 15 minutes (excluding normal calibration periods).
(Basis: District Regulations 1-520.1, 9-9-501, BACT, Offsets, Cumulative Increase)

Verification: At least 30 days before first fire, the project owner shall submit to the CPM a plan on how the measurements and recordings required by this condition will be performed.

AQ-25 As specified below, the owner/operator shall calculate and record the following data:

- total Heat Input Rate for every clock hour and the average hourly Heat Input Rate for every rolling 3-hour period.
- on an hourly basis, the cumulative total Heat Input Rate for each calendar day for the following: each Gas Turbine and all three sources (S-1, S-2, and S-3).
- the average NO_x mass emissions (as NO_2), CO mass emissions, and corrected NO_x and CO emission concentrations for every clock hour and for every rolling 3-hour period.
- on an hourly basis, the cumulative total NO_x mass emissions (as NO_2) and the cumulative total CO mass emissions, for each calendar day for the following: each Gas Turbine (S-1, S-2, and S-3) combined.
- For each calendar day, the average hourly Heat Input Rates, Corrected NO_x emission concentrations, NO_x mass emissions (as NO_2), corrected CO emission concentrations, and CO mass emissions for each Gas Turbine combined.
- On a daily basis, the cumulative total NO_x mass emissions (as NO_2) and cumulative total CO mass emissions, for the previous consecutive twelve month period for all three sources (S-1, S-2, and S-3) combined.

(Basis: District Regulations 1-520.1, 9-9-501, BACT, Offsets, Cumulative Increase)

Verification: The project owner shall submit to the District and CPM the quarterly and annual compliance reports as required by Condition 18.

AQ-26 To demonstrate compliance with Conditions 18(f), 18(g), 18(h), 21(c), 21(d) and 21(e), the owner/operator shall calculate and record on a daily basis, the Precursor Organic Compound (POC) mass emissions, Fine Particulate Matter (PM10) mass emissions (including condensable particulate matter), and Sulfur Dioxide (SO_2) mass emissions from each power train. The owner/operator shall use the

actual Heat Input Rates calculated pursuant to Condition 28, actual Gas Turbine Start-up Times, actual Gas Turbine Shutdown Times, and CEC and District-approved emission factors to calculate these emissions. The calculated emissions shall be presented as follows:

(a) For each calendar day, POC, PM10, and SO_2 emissions shall be summarized for: each power train (S-1, S-2, and S-3) combined.

(b) On a daily basis, the 365 day rolling average cumulative total POC, PM10, and SO_2 mass emissions, for all three sources (S-1, S-2, and S-3) combined.

(Basis: Offsets, Cumulative Increase)

Verification: The project owner shall submit to the District and CPM the quarterly and annual compliance reports as required by Condition 18.

AQ-27 To demonstrate compliance with Condition 22, the owner/operator shall calculate and record on an annual basis the maximum projected annual emissions of: Acetaldehyde, Acrolein, Formaldehyde and Benzene. Maximum projected annual emissions shall be calculated using the maximum Heat Input Rate of 5,847,600 MM Btu/year and the highest emission factor (pounds of pollutant per MM Btu of Heat Input) determined by any source test of the S-1, S-2, and S-3 Gas Turbine Combustors. (Basis: TRMP)

Verification: The project owner shall submit to the District and CPM the quarterly and annual compliance reports as required by Condition 18.

AQ-28 Within 120 days of start-up of the SFERP, the owner/operator shall conduct a District-approved source test at the exhaust point P-1, P-2, or P-3 to determine the corrected ammonia (NH_3) emission concentration compliance with Condition18(e). The source test shall determine the correlation between the heat input rates of each gas turbine S-1, S-2, and S-3 and NH_3 mass emissions. (Basis: TRMP)

Verification: The project owner shall notify the District and the CPM within seven (7) working days before the execution of the source tests required in this condition. Source test results shall be submitted to the District and to the CPM within 60 days of the date of the tests.

AQ-29 The owner/operator shall determine the SCR System ammonia injection rate and the corresponding NH_3 emission concentration at emission point P-1, P-2, or P-3. The source test shall be conducted over the expected operating range of the turbine (including, but not limited to minimum, 70%, 85%, and 100% load) to establish the range of ammonia injection rates necessary to achieve NO_x emission reductions while maintaining ammonia slip levels. Continuing compliance with Condition 18(e) shall be demonstrated through calculations of corrected ammonia concentrations based upon the

source test correlation and continuous records of ammonia injection rate. (Basis: TRMP)

Verification: The project owner shall notify the District and the CPM within seven (7) working days before the execution of the source tests required in this condition. Source test results shall be submitted to the District and to the CPM within 60 days of the date of the tests.

AQ-30 Within 120 days of start-up of the SFERP and on an annual basis thereafter, the owner/operator shall conduct a District-approved source test on exhaust points P-1, P-2, and P-3 while each Gas Turbine Combustor is operating at maximum load to determine compliance with Conditions 18(a), (b), (c), (d), (f), (g), and (h), while each Gas Turbine Combustor is operating at minimum load to determine compliance with Conditions 18(b) and (d), and to verify the accuracy of the continuous emission monitors required in Condition 23. The owner/operator shall test for (as a minimum): water content, stack gas flow rate, oxygen concentration, precursor organic compound concentration and mass emissions, nitrogen oxide concentration and mass emissions (as NO_2), carbon monoxide concentration and mass emissions, sulfur dioxide concentration and mass emissions, methane, ethane, and particulate matter (PM10) emissions including condensable particulate matter. (Basis: BACT, offsets)

Verification: Approval of the source test protocols, as required in condition 32, and the source test reports shall be deemed as verification for this condition. The project owner shall notify the District and the CPM within seven (7) working days before the execution of the source tests required in this condition. Source test results shall be submitted to the District and to the CPM within 60 days of the date of the tests.

AQ-31 Within 120 days of start-up of the SFERP and on a biennial basis (once every two years) thereafter, the owner/operator shall conduct a District-approved source test at the exhaust point P-1, P-2, or P-3 while the Gas Turbine Combustor is operating at maximum allowable operating rates to demonstrate compliance with Condition 27. If three consecutive biennial source tests demonstrate that the annual emission rates calculated pursuant to Part 27 for any of the compounds listed below are less than the BAAQMD Toxic Risk Management Policy trigger levels shown, then the owner/operator may discontinue future testing for that pollutant:

- Acetaldehyde $\leq$ 235 pounds/year
- Acrolein $\leq$ 21 pounds/year
- Benzene $\leq$ 19 pounds/year
- Formaldehyde $\leq$ 2110 pounds/year

(Basis: TRMP)

Verification: Approval of the source test protocols, as required in condition 16, and the source test reports shall be deemed as verification for this condition. The project owner shall notify the District and the CPM within seven (7) working days before the execution of the source tests required in this condition. Source test results shall be submitted to the District and to the CPM within 60 days of the date of the tests.

AQ-32 The owner/operator shall obtain approval for all source test procedures from the District's Source Test Section and the CEC CPM prior to conducting any tests. The owner/operator shall comply with all applicable testing requirements for continuous emission monitors as specified in Volume V of the District's Manual of Procedures. The owner/operator shall notify the District's Source Test Section and the CEC CPM in writing of the source test protocols and projected test dates at least 7 days prior to the testing date(s). As indicated above, the owner/operator shall measure the contribution of condensable PM (back half) to the total PM10 emissions. However, the owner/operator may propose alternative measuring techniques to measure condensable PM such as the use of a dilution tunnel or other appropriate method used to capture semi-volatile organic compounds. Source test results shall be submitted to the District and the CEC CPM within 60 days of conducting the tests. (Basis: BACT)

Verification: Submitting and getting approval of the source test procedures is the verification of this condition. The project owner shall notify the District and the CPM within seven (7) working days before the execution of the source tests required in this condition. Source test results shall be submitted to the District and to the CPM within 60 days of the date of the tests.

AQ-33 The owner/operator of the SFERP shall submit all reports (including, but not limited to monthly CEM reports, monitor breakdown reports, emission excess reports, equipment breakdown reports, etc.) as required by District Rules or Regulations and in accordance with all procedures and time limits specified in the Rule, Regulation, Manual of Procedures, or Enforcement Division Policies & Procedures Manual. (Basis: Regulation 2-6-502)

Verification: The project owner shall submit to the District and CPM the reports as required by procedures and time limits specified in the Rule, Regulation, Manual of Procedures, or Enforcement Division Policies & Procedures Manual.

AQ-34 The owner/operator of the SFERP shall maintain all records and reports on site for a minimum of 5 years. These records shall include but are not limited to: continuous monitoring records (firing hours, fuel flows, emission rates, monitor excesses, breakdowns, etc.), source test and analytical records, natural gas sulfur content analysis results, emission calculation records, records of plant upsets and related

incidents. The owner/operator shall make all records and reports available to District and the CEC CPM staff upon request. (Basis: Regulation 2-6-501)

Verification: During site inspection, the project owner shall make all records and reports available to the District, ARB, EPA or CEC staff.

AQ-35 The owner/operator of the SFERP shall notify the District and the CEC CPM of any violations of these permit conditions. Notification shall be submitted in a timely manner, in accordance with all applicable District Rules and Regulations, and the Manual of Procedures. Notwithstanding the notification and reporting requirements given in any District Rule, Regulation, or the Manual of Procedures, the owner/operator shall submit written notification (facsimile is acceptable) to the Enforcement Division within 96 hours of the violation of any permit condition. (Basis: Regulation 2-1-403)

Verification: Submittal of these notifications as required by this condition is the verification of these permit conditions. In addition, as part of the quarterly and annual compliance reports of Condition 18, the project owner shall include information on the dates when these violations occurred and when the project owner notified the District and the CPM.

AQ-36 The owner/operator of SFERP shall provide adequate stack sampling ports and platforms to enable the performance of source testing. The location and configuration of the stack sampling ports shall be subject to BAAQMD review and approval. (Basis: Regulation 1-501)

Verification: 120 days prior to the start of any site clearing or ground disturbance activities, the project owner shall provide the District and CPM an "approved for construction" drawing showing the appropriate stack height and location of sampling ports and platforms. The project owner shall make the site available to the District, EPA and CEC staff for inspection.

AQ-37 Within 180 days of the issuance of the Authority to Construct for the SFERP, the owner/operator shall contact the BAAQMD Technical Services Division (Source Test Section) regarding requirements for the continuous monitors, sampling ports, platforms, and source tests required by parts 23, 28, 29, 30, and 31. All source testing and monitoring must be conducted in accordance with the BAAQMD Manual of Procedures or EPA methods. (Basis: Regulation 1-501)

Verification: 120 days prior to the start of any site clearing or ground disturbance activities, the project owner shall provide the District and CPM an "approved for construction" drawing showing the appropriate stack height and location of sampling ports and platforms. The project owner shall make the site available to the District, EPA and CEC staff for inspection.

AQ-38 Prior to the issuance of the BAAQMD Authority to Construct for the SFERP, the owner/operator shall provide to the District valid emission reduction credit banking certificates in the amount of 47.5 tons/year of Nitrogen Oxides or equivalent as defined by District Regulations 2-2-302.1 and 2-2-302.2. (Basis: Offsets)

Verification: At least 30 days prior to issuance of the District's Authority to Construct, the project owner shall provide valid emission reduction credit banking certificates to the District and the CPM for approval.

AQ-39 Pursuant to BAAQMD Regulation 2, Rule 6, section 404.1, the owner/operator of the SFERP shall submit an application to the BAAQMD for a major facility review permit within 12 months of the issuance of the Authority to Construct. (Basis: Regulation 2-6-404.1)

Verification: The project owner shall submit to the CPM copies of the Federal (Title IV) Acid Rain and (Title V) Operating Permit within 30 days after they are issued by the District.

AQ-40 Pursuant to 40 CFR Part 72.30(b)(2)(ii) of the Federal Acid Rain Program, the owner/operator of the SFERP shall not operate any of the gas turbines until either: 1) a Title IV Operating Permit has been issued; 2) 24 months after a Title IV Operating Permit Application has been submitted, to the District whichever is earlier. (Basis: Regulation 2, Rule 7)

Verification: The project owner shall submit to the District and CPM the quarterly and annual compliance reports as required by Condition 18.

AQ-41 The owner/operator of SFERP shall comply with the continuous emission monitoring requirements of 40 CFR Part 60 or 75 (Appendix A; Specifications and Test procedures, and Appendix B; Quality Assurance and Quality Control Procedures). (Basis: Regulation 2, Rule 7)

Verification: At least 30 days prior to any site clearing or ground disturbance activities, the project owner shall seek approval from the District for an emission monitoring plan.

AQ-42 The owner/operator shall take monthly samples of the natural gas utilized at the SFERP and analyze for the sulfur content using District-approved laboratory methods, or shall obtain certified analytical results from the gas supplier. The sulfur content test results shall be retained on site for a minimum of five years from the test date and shall be utilized to satisfy the requirements of 40 CFR Part 60, subpart GG. (Basis: Recordkeeping)

Verification: The project owner shall submit to the District and CPM the quarterly and annual compliance reports as required by Condition 18.

REFERENCES

SFERP 2004a - City and County of San Francisco/Blout (tn: 31130). Application for Certification San Francisco Electric Reliability Project - 145-megawatt natural gas-fired peaking power plant located in San Francisco. Submitted to CEC/Therkelsen/Dockets on 3/18/04.

SFERP 2004c - CH2MHill/Carrier (tn: 31127). Electronic copies (CD-ROM) of SFERP Ambient Air Quality Modeling Files, March 04. Submitted to CEC/Pfanner/Dockets on 3/18/04.

SFERP 2004d - CH2MHill/Carrier (tn: 31128). Sets of 7.5 Minute U.S. Geological Survey (USGS) Quad Maps. Submitted to CEC/Pfanner/Dockets on 3/18/04.

SFERP 2004f - City and County of San Francisco (tn: 31132). Application for a Determination of Compliance & Authority to Construct. Submitted to Bay Area Air Quality Management District/Dockets on 3/22/04.

BAAQMD 2004a – Bay Area Air Quality MD/Nishimura (tn: 31204). Letter to CEC dated April 7, 2004 regarding BAAQMD's Completed Initial Review of the AFC. Submitted to CEC/Pfanner on 4/7/04.

CEC 2004g - California Energy Commission/Keese (tn: 31237). Letter proposing to construct and operate a simple-cycle power plant in San Francisco. Submitted to The Honorable Mark Leno, Member of the Assembly on 4/14/04.

SFERP 2004g - CH2MHill/Carrier (tn: 31268). Data Adequacy Supplement. Submitted to CEC/Pfanner/Dockets on 4/16/04.

SFERP 2004h - CH2MHill/Carrier (tn: 31274). Attachment to the Data Adequacy Supplement: Attachment WM-DA-1, the Phase I Environmental Site Assessment. Submitted to CEC/Pfanner/Dockets on 4/16/04.

SFERP 2004i - CH2MHill/Carrier (tn: 31275). Attachment to the Data Adequacy Supplement: Attachment WR-DA-1. Submitted to CEC/Pfanner/Dockets on 4/16/04.

CEC 2004aa – California Energy Commission/Pfanner (tn: 31644). Issues Identification Report. Submitted to San Francisco Public Utility Commission/CEC/Dockets on 6/4/04.

CEC 2004bb – California Energy Commission/Pfanner (tn: 31642). Data Requests Nos. 1 thru 91. Submitted to SF PUC/Labonte/CEC/Dockets on 6/4/04.

SFERP 2004t– CH2MHill/Carrier (tn: 31854). Data Responses Set 1A. Response to Staff's Data Requests dated 6/4/04. Submitted to CEC/Pfanner/Dockets on 7/6/04.

FARENDIN 2004a – Lisa Farendin (tn: 31879). Comments on SFERP Workshop on July 19, 2004. Submitted to CEC/PAO/Dockets on 7/12/04.

SFERP 2004u– CH2MHill/Carrier (tn: 31880). Data Response Set 1B. Submitted to CEC/Pfanner/Dockets on 7/12/04.

SFERP 2004v– CH2MHill/Carrier (tn: 31894). Data Response Set 1C. Submitted to CEC/Pfanner/Dockets on 7/15/04.

SFERP 2004x– CH2MHill/Carrier (tn: 31948). Informal Data Response Set 1. Submitted to CEC/Pfanner/Dockets on 7/23/04.

CARE 2004b – CAlifornia for Renewable Energy/Boyd (tn: 32067). First Set of Data Request of CARE. Submitted to CEC/Dockets on 8/10/04.

CARTER 2004z – Anna Carter (tn: 32111). San Francisco Natural Gas Simple Cycle Plant. Submitted to CEC/Pfanner/Dockets on 8/17/04.

SFERP 2004aa – CH2MHill (tn: 32141). Response to Data Requests 1 through 9, Set 1. Submitted to CEC/Dockets on 8/18/04.

SFERP 2004ff – CH2MHill/Carrier (tn: 32218). Data Response, Set 1D. Submitted to CEC/Pfanner/Dockets on 8/27/04.

SFERP 2004gg – CH2MHill/Carrier (tn: 32229). Informal Data Response, Set 4. Submitted to CEC/Pfanner/Dockets on 8/27/04.

SFPUC 2005a – San Francisco Public Utilities Commission/Hale (tn: 34403). Amendment A of the Application for Certification. Submitted to CEC/Therkelsen/Dockets on 3/25/05.

SFERP 2005b – San Francisco Electric Reliability Project (tn: 33737). Air Quality Modeling Files. Submitted to Dockets on 3/25/05.

SFERP 2005e – San Francisco Electric Reliability Project (tn: 33763). Application for Determination of Compliance. Submitted to CEC/Dockets on 3/29/05.

CEC 2005b – California Energy Commission/Johnson (tn: 33815). Notice of Receipt. Supplement A, Site Relocation. Submitted to CEC/Dockets on 4/5/05.

SFERP 2005f – Sierra Research/Matthews (tn: 33920). Supplement to the AFC, Air Quality Errata. Submitted to CEC/Pfanner/Dockets on 4/13/05.

SFERP 2005g – Sierra Research/Matthews (tn: 33922). Revised Air Quality Modeling Files. Submitted to CEC/Pfanner/Dockets on 4/13/05.

SFERP 2005k – Sierra Research/Matthews (tn: 34289). Application for Determination of Compliance. Submitted to Bay Area Air Quality Management District/Bateman/CEC/Dockets on 5/11/05.

BIOLOGICAL RESOURCES

Susan D. Sanders

SUMMARY OF CONCLUSIONS

Construction of the San Francisco Electric Reliability Project would not have any significant direct impacts to sensitive biological resources and complies with applicable laws, ordinances, regulations and standards because construction activities will occur in areas that are paved or otherwise barren of native plants or wildlife. Transmission lines would be buried, eliminating potential for bird electrocution or collisions with transmission lines. Process water for operations would be supplied by the city's combined sewage system and go through a new on-site water treatment plant, eliminating potential impacts to aquatic biota. However, the United States Fish & Wildlife Service expressed concern about air emissions and potential impacts to listed (i.e., on Federal Threatened or Endangered Species lists or a Species of Special Concern) butterflies and plants found in serpentine grasslands on San Bruno Mountain, approximately 4.5 miles south of the project area. Nitrogen deposition from air emissions can change serpentine plant community composition, with adverse effects to several species of threatened or endangered butterfly and plant species.

Existing nitrogen deposition rates at San Bruno Mountain are estimated to be 6.169 kilograms/hectare/year (kg/ha/yr). The San Francisco Electric Reliability Project would contribute an additional 0.0059 kg/ha/year to this background level, resulting in a net nitrogen deposition of 6.175 kg/ha/year, or a 0.0009 percent increase. The background deposition rate is already above the level that is likely to be affecting listed species and their habitat on San Bruno Mountain. Operation of the San Francisco Electric Reliability Project would contribute a small amount to an ongoing significant impact (nitrogen deposition) to protected species and their habitats on San Bruno Mountain. Any contribution, even a minor one, to an existing cumulative impact to listed species is potentially significant. The project owner has purchased emission reduction credits from the nearby Potrero Power Plant to offset their nitrogen emissions. The emission reduction credits would mitigate the project's minor contribution to ongoing cumulative impacts to protected species on San Bruno Mountain and be in compliance with all laws, ordinances, regulations, and standards.

INTRODUCTION

In this analysis, staff describes the biological resources of the project site and ancillary facilities, and of regional sensitive habitats potentially affected by the project. We also determined the need for mitigation, the adequacy of mitigation proposed by the applicant, and where necessary, specific additional mitigation measures to reduce identified impacts to less than significant levels. In this analysis, we also determined compliance with laws, ordinances, regulations, and standards (LORS), and recommended conditions of certification.

This analysis is based, in part, upon information provided in the Application for Certification (AFC) for the San Francisco Electric Reliability Project (SFERP) (SFPUC 2004a, Section 8.2 and Appendices 8.2 A and B), the supplement to the AFC (SFERP 2005a), responses to staff's Data Requests 157-159 (CH2MHill 2004), and discussions and correspondence with the United States Fish and Wildlife Service (USFWS) (USINTERIOR 2004a).

LAWS, ORDINANCES, REGULATIONS AND STANDARDS

Biological Resources Table 1, below, identifies the LORS applicable to the SFERP analysis.

BIOLOGICAL RESOURCES Table 1
Laws, Ordinances, Regulations, and Standards

Applicable Law	Description
FEDERAL	
Federal Endangered Species Act (1973) Title 16, U. S. Code section 1531	Projects that could adversely impact a federally listed species require consultation with the U. S. Fish and Wildlife Service and mitigation of potential impacts
Migratory Bird Treaty Act Title 16, U. S. Code sections 703 to 712	Protects all migratory birds, including their nests and eggs
Bald and Golden Eagle Protection Act Title 16, U. S. Code section 668	Protects bald and golden eagles from harm or trade in parts
STATE	
State Endangered Species Act (1984) Fish and Game Code, section 2050 et seq.	For species that are protected (listed) by the state, these species can not be 'taken' or harmed w/out a 'take' permit provided by the California Department of Fish & Game
Fully Protected Species Fish and Game Code, sections 3511, 4700, 5050, and 5515	Prohibits take of species that are classified as Fully Protected
Nests and Eggs – Take, Possess or Destroy, Fish and Game Code, sections 3503 and 3503.5	Protects birds by making it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Also, specifically protects birds of prey and their eggs
Migratory Birds Fish and Game Code, section 3513	Protects California's migratory birds by making it unlawful to take or possess any migratory non-game bird as designated by the Migratory Bird Treaty Act
Native Plant Protection Act (1977) Fish and Game Code, section 1900 et seq.	Designates and protects rare, threatened and endangered California plants
Title 14, California Code of Regulations, sections 670.2 and 670.5	Lists animals designated as threatened or endangered in California

Applicable Law	Description
California Fish and Game Code, sections 1601 through 1604	Prohibits alteration of any stream, including intermittent and seasonal channels and many artificial channels, without a permit from California Department of Fish and Game
McAteer-Petris Act and San Francisco Bay Plan – administered by the San Francisco Bay Conservation and Development Commission (BCDC)	BCDC regulates activities and development with the potential to adversely impact the San Francisco Bay
LOCAL	
City and County of San Francisco General Plan, Objective 8, Policies 1.1, 1.2, 1.3, & 1.4	Conserve, protect, restore and replenish the natural resources of San Francisco
City and County of San Francisco General Plan, Objective 8 - Policies 8.1, 8.2, and 8.3	Ensures protection of plant and animal life in the City, coordination with the California Department of Fish and Game, protection of habitat of plants and animals that need a relatively natural environment, and rare and endangered species
San Francisco General Plan Water Resources Policy 3.3	Implement plan to improve sewage treatment and halt pollution of the Bay and ocean
Sustainability Plan for the City of San Francisco, goals 2, 3, and 4	Protect and restore remnant natural habitats, sensitive species, and to maximize habitat value in developed and naturalistic areas, both public and private
San Mateo County General Plan, Policies 1.2, 1.23, 1.26, and 1.27	Protect sensitive habitats, regulate development to minimize impacts to vegetation, water, fish and wildlife resources, and protect rare, endangered, and unique plants and animals

SETTING

REGIONAL

The SFERP will be located near the western shore of San Francisco Bay in the Potrero District of San Francisco. The San Francisco Bay, the largest estuary in the western United States, is an inlet where the waters from the Sacramento and San Joaquin rivers meet the Pacific Ocean. A wide variety of habitat types including deep open water, coastal shoreline, salt flats, oak woodlands, grasslands, salt and brackish marshes, and riparian areas occur in the San Francisco region due to the combination of a favorable Mediterranean climate, the coastal mountains and estuarine environments.

Significant biological resources in the project vicinity include the San Francisco Bay, Heron's Head Park, San Bruno Mountain, and Islais Creek. The Bay provides important habitat for fish, migratory birds, and wetland plant and wildlife species. Heron's Head Park is located approximately one mile south of the project and adjacent to the Hunters Point Power Plant. The 24-acre park is a restored wetland situated on top of a landfill.

San Bruno Mountain State and County Park is located approximately 4.5 miles southwest of the project in San Mateo County, east of Daly City. The biological resources of this park are the subject of the San Bruno Mountain Habitat Conservation Plan (USFWS 1998). Islais Creek is located approximately 990 feet directly south of the proposed SFERP site. It is one of the few freshwater creeks located in the city of San Francisco and once emptied into a large marsh bordering the Bay, but has been channelized and riprapped. It is now a tidal ship channel and provides little natural habitat. Restoration efforts on Islais Creek have focused on cleaning up contaminated sediment and development of water-related recreation amenities.

PROJECT, SITE, AND VICINITY DESCRIPTION

The four-acre SFERP site is located in a heavily industrialized area of San Francisco. The plant site has been cleared of permanent structures and is currently occupied by a temporary cement batch plant. The existing Potrero Power Plant is approximately 0.3 mile to the north. The approximately 8.5-acre proposed laydown area is immediately east of the site, on Port of San Francisco land. This area is currently being used for equipment storage and separates the SFERP site from the Bay. Industrial and commercial land uses are immediately adjacent to all site boundaries. Bay aquatic habitats are located approximately 180 feet northeast of the site and 120 feet from the temporary laydown yard. The associated SFERP underground electrical transmission, gas, and water lines will be located along or within roadways and are entirely within commercial and industrial areas.

The site is characterized by hard-packed dirt that is unvegetated and covered with gravel. Only sparse non-native grasses and forbs are found on site. There are no remaining features that provide habitat for plant or wildlife species. The associated linear features of the site (natural gas pipeline, water supply lines, underground transmission lines) will be contained within a combination of pavement and hard-pack gravel roads and concrete sidewalks. The 8.5-acre laydown area is an often-used storage area consisting of hard-packed gravel and dirt, with a paved perimeter. The north and northeastern boundaries of the laydown are approximately 120 feet from the Bay. The adjacent shoreline is armored with riprap (rocks) and the upper bank includes sparse, weedy vegetation such as fennel, pampas grass, and other non-native grasses and forbs. This area is outside of the laydown area and provides limited forage and resting areas for species such as western gull (*Larus occidentalis*) and rock dove (*Columba livia*). San Francisco Bay is the closest area of significant habitat to the SFERP site. The Bay shoreline has been significantly modified with piers, bulkheads, riprap, and stabilizing structures. The project site, laydown area, and associated linear facilities do not include any wetlands or waters of the United States or other sensitive habitat types.

Special Status Species

The project site and immediate vicinity provides no habitat for special-status plants or wildlife. Many of the rare plants and animals that have been recorded near the project area occur in plant communities such as salt marsh or coastal scrub, habitats that have long been eliminated by industrial and residential development in the immediate project area. However, rare plants and animals dependent on native and non-native grasslands and other habitats on San Bruno Mountain (approximately 4.5 miles southwest of the project site) are within the range of air emissions from the SFERP.

Five special-status insects depend on nectar sources associated with serpentine habitats such as those on San Bruno Mountain. Those species include San Bruno elfin butterfly (*Incisalia mossii bayensis*), mission blue butterfly (*Icaricia icarioides missionensis*), callippe silverspot butterfly (*Speyeria callippe callippe*), Bay checkerspot butterfly (*Euphydryas editha bayensis*), and Opler's longhorn moth (*Adela oplerella*). Biological Resources **Table 2** summarizes the status of special status plant and animal species that could occur at San Bruno Mountain.

Special status aquatic species in the vicinity of the project area, including Central Valley fall/late fall run Chinook salmon and winter run Chinook salmon (*Oncorhynchus tshawytscha*) and Central California coast Coho salmon (*Oncorhynchus kisutch*), are not considered further in this analysis because the project will have no effect on aquatic or shoreline environments. The SFERP water will be supplied and discharged by conventional City of San Francisco (City) infrastructure, with no direct intake or discharge of San Francisco Bay water. A complete list of sensitive plant and animal species that occur in the project region is provided in Table 8.2-2 of the Application for Certification (SFPUC 2005a, pages 8.2-25 to 8.2-31).

Critical Habitat

Critical habitat refers to specific geographic areas, whether occupied by a listed species or not, that are essential for conservation of a species and that have been formally designated by rule published in the Federal Register. Although the proposed project disturbance areas do not fall within any designated or proposed Critical Habitat areas, it is located in the general vicinity of Critical Habitat designated under the Federal Endangered Species Act (FESA) for:

- Central Valley fall/late fall-run Chinook salmon Evolutionarily Significant Unit (ESU) (*Oncorhynchus tshawytscha*);
- Central California coast Coho salmon ESU (*Oncorhynchus kisutch*);
- Winter run Chinook salmon ESU (*Oncorhynchus tshawytscha*); and
- Steller (northern) sea lion (*Eumetopias jubatus*).

An ESU is a distinctive group of Pacific salmon or steelhead. The designated Critical Habitats for the above three salmon species are associated with aquatic resources in the San Francisco Bay and Delta, while local sea lion Critical Habitat is limited to offshore island rookeries. No project features or construction activities would affect any aquatic or shore habitats.

The Bay checkerspot butterfly, a federal Threatened species, historically inhabited San Bruno Mountain. San Bruno Mountain is 4.5 miles southwest of the SFERP project site, but still within range of indirect air quality impacts from SFERP. This population of Bay checkerspot butterflies was extirpated in the mid-1980s (USFWS 1998), but the USFWS has designated portions of San Bruno Mountain Critical Habitat for the recovery of this species.

BIOLOGICAL RESOURCES Table 2

Regional Special Status Species

Species	Status*	Habitat
Franciscan manzanita Arctostaphylos hookeri *ssp.* franciscana	FSC, CNPS List 1A	Coastal scrub (serpentinite). May be found on San Bruno Mountain. Last recorded in 1942.
San Francisco gumplant *Grindelia hirsutula* var. *maritima*	FSC, CNPS List 1B	Coastal bluff scrub, coastal scrub, valley and foothill grassland/sandy or serpentinite. May be found on San Bruno Mountain.
Marin western flax *Hesperolinon congestum*	FT, CT, CNPS List 1B	Chaparral, valley and foothill grassland-serpentinite. May be found on San Bruno Mountain.
White-rayed pentachaeta *Pentachaeta bellidiflora*	FE, CE, CNPS List 1B	Valley and foothill grassland (often on serpentine). May be found on San Bruno Mountain. Currently known from one location near Hwy 280.
Adobe sanicle *Sanicula maritima*	FSC, CNPS List 1B	Chaparral, coastal prairie, meadows and seeps, valley and foothill grassland/clay, serpentine. May be found on San Bruno Mountain.
Santa Cruz microseris *Stebbinsoseris decipiens*	FSC, CNPS List 1B	Broadleaved upland forest, closed-coned coniferous forest, chaparral, coastal prairie, coastal scrub, valley and foothill grassland/open areas, sometimes on serpentine. May be found on San Bruno Mountain.
San Francisco owl's-clover *Triphysaria floribunda*	FSC, CNPS List 1B	Coastal prairie, coastal scrub, valley and foothill grassland/usually serpentine. May be found on San Bruno Mountain.
Bay checkerspot butterfly *Euphydryas editha bayensis*	FT	Serpentine grassland with adult nectar sources and larval host plant (dwarf plantain and owls clover). Found on San Bruno Mountain as recently as mid-1980s, portions of San Bruno Mt designated as Critical Habitat.
Mission blue butterfly *Icaricia icarioides missionensis*	FE	Dunes and grassland areas with *Lupinus* host plant. Found on San Bruno Mountain. Restricted to three metapopulations, including San Bruno Mountain in San Mateo County, Twin Peaks in San Francisco, and the vicinity of Skyline College in San Mateo County.
San Bruno elfin butterfly *Incisalia mossii bayensis*	FE	Wooded canyons with cliffs and rocky outcrops. Stonecrop host plant. Found on San Bruno Mountain. Current population restricted to San Bruno Mountain, Milagra Ridge, Montara Mountain, and Whiting Ridge.
Callippe silverspot butterfly *Speyeria callippe callippe*	FE	Dry woodlands, foothill grasslands, and chaparral communities. Violet host plant. Closest metapopulation found on San Bruno Mountain.
Opler's longhorn moth *Adela oplerella*	FSC	Serpentine grasslands with larval food plant, California cream cups. Found on San Bruno Mountain.

*** STATUS - Federal Status - FE** = Federal listed Endangered. **FT** = Federally listed Threatened; **FSC** = Federal Species of Special Concern; **California Status - CE** = State listed Endangered, **CT** = State listed Threatened; **CNPS (California Native Plant Society) - CNPS List 1A** - Plants presumed extinct in California, **CNPS List 1B** - Plants rare, threatened, or endangered in California and elsewhere and rare throughout their range

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

Significant biological resources impacts would occur if state or federal listed species, Fully Protected species, candidates for state or federal listing and/or Species of Concern were likely to be impacted. Interruption of species migration, reduction of fish, wildlife and plant habitat, and disturbance of wetlands, marshes, riparian areas or other wildlife habitat would also be considered significant impacts.

DIRECT AND INDIRECT IMPACTS AND MITIGATION

Direct impacts occur because of the project and at the same time and place. *Indirect* impacts occur because of the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect impacts may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Construction Impacts and Mitigation

SFERP Project Site and Temporary Construction Laydown Area

SFERP construction would permanently occupy approximately four acres of an existing industrial site. This area is currently covered with gravel and dirt with patches of weedy area supporting sparse non-native vegetation. The plant site has been cleared of all permanent structures. Currently, there are some temporary facilities on the property including construction trailers, a construction laydown area and a cement batch plant. The temporary facilities will be removed prior to the construction of the SFERP. The project site has a history of industrial use and is surrounded by a variety of industrial uses primarily associated with the Port of San Francisco.

The project site and laydown area provides little or no habitat value for native plant and wildlife species. The construction laydown area will be approximately 8.5 acres. The laydown area would be located directly east and adjacent to the project site, between 25th and Cesar Chavez streets and between the project site and the Bay. The proposed laydown area has been recently graded and partially graveled. Due to the existing high level of disturbance at the project site, and the absence of natural plant communities at the site, SFERP's construction would not result in direct impacts to sensitive biological resources. No jurisdictional wetlands or waters are present on the project site.

No aquatic habitat will be adversely affected by construction or by operation of the cooling system. As described in more detail below, no water will be withdrawn directly from the Bay or discharged there. Cooling water discharged from the plant cooling system and other plant wastewater will be sent to the Southeast Water Pollution Control Plant (SEWPCP) via the City's combined sewer system. Likewise, stormwater runoff from the site will be sent to the SEWPCP via the combined sewer system. Water will be applied to the site and laydown area for dust control during construction. Staff concludes that sensitive species, wetlands, or other sensitive biological resources will

not be impacted by construction of the SFERP plant site, and does not propose any mitigation measures.

Construction Noise

Noise due to construction activities can have significant impacts on local wildlife if loud noises occur during the breeding or nesting season, or if the noise affects a species' ability to find prey or avoid predators. Construction noise is not anticipated to exceed current exposure levels at the project site (SFPUC 2005a, Section 8.5). Any additional noise created during power plant construction will be temporary and should not pose a threat to nearby shoreline species and their habitat, so staff concludes that power plant construction noise impacts will be insignificant and does not propose any mitigation.

Natural Gas Supply and Water Supply Pipelines

Fuel will be delivered to SFERP via an approximately 900-foot long natural gas pipeline. This gas pipeline will tie in with the existing PG&E San Francisco Line 101 located at the corner of Illinois and 25th streets, west of the plant site. The primary method of pipeline construction includes excavation of an open trench approximately four feet deep and three to seven feet wide. The construction corridor will be approximately 50 feet wide.

The potable water supply line is a 300-foot long tie-in with an existing city main located on Cesar Chavez Street. The process water supply line is an approximately 0.76 mile tie-in with a City combined sewer system to a new treatment plant located within the site. Pipeline installation for natural gas lines and water supply lines will involve an open trench to the local tie-in location, and will occur entirely within paved areas that lack sensitive biological resources. Pipeline installation for natural gas lines and water supply lines will involve an open trench to the local tie-in location, and will occur entirely within paved areas that lack sensitive biological resources. Staff concludes that sensitive species or habitat will not be impacted by natural gas or water supply pipeline construction, and does not propose any biological resource mitigations.

115-kV Transmission Lines

An approximately 3,000-foot long underground 115-kV transmission line will connect the plant switchyard with the existing Potrero Substation. Construction will involve open duct trench to the local tie-in location, and will occur entirely within paved areas that do not support natural plant communities or sensitive biological resources. Staff concludes that sensitive species or habitat will not be impacted by construction of underground transmission lines, and does not propose any biological resource mitigations.

Operation Impacts and Mitigation

Noise and Lighting during Project Operation

Noise due to ongoing plant operations can have significant impacts on local wildlife if loud noises occur during the breeding or nesting season or if the noise affects a species' ability to find prey or avoid predators. Operation noise from the SFERP site will include noise created by the generators, cooling tower, transformers, and other components of the plant. Noise from operation of the power plant is predicted not to

exceed 54 dBA (decibels) at the nearest residence to the site. This plant site is currently zoned industrial and is surrounded by several industrial facilities adjacent to the site. These facilities typically operate 24 hours per day, seven days per week and have standard industrial lighting and noise emissions. Noise resulting from operation of the SFERP power plant is not likely to adversely impact wildlife because it will not differ substantially from existing noise levels, and wildlife using the shoreline area adjacent to the plant site will have acclimated to existing noise.

Bright night lighting could disturb wildlife (e.g., nesting birds, foraging mammals, and flying insects). Night lighting is also suspected to attract migratory birds to some areas and, if the lights are on tall buildings or the combustion turbine exhaust stacks, collisions could occur. However, the SFERP exhaust stack height of 85 feet is lower in profile than much of the surrounding development. In comparison, exhaust stack height for the nearby Potrero Power Plant Unit 3 is approximately 300 feet.

Operation of the power plant will require onsite nighttime lighting for safety and security. To reduce offsite lighting impacts, lighting at the facility will be restricted to areas required for safety, security, and operation. Exterior lights will be hooded, and lights will be directed onsite so that significant light or glare will be minimized. Low-pressure sodium lamps and fixtures of a non-glare type will be specified. For areas where lighting is not required for normal operation, safety, or security, switched lighting circuits will be provided, thus allowing these areas to remain dark at most times, minimizing the amount of lighting potentially visible offsite. With these measures to reduce offsite light on the Bay, lighting from the new facility is not likely to attract or otherwise interfere with wildlife activities in the vicinity.

Potential for Collision and Electrocution Hazard to Birds

The SFERP project will bury the approximately 3,000-foot long electrical transmission lines, eliminating potential impacts associated with bird electrocution and collision with aboveground lines. The proposed project would require construction of three, 85-foot high exhaust stacks that could potentially pose a collision threat to birds. Bird collisions with tall structures typically involve nocturnal migrants flying at night in inclement weather and low-visibility conditions, colliding with tall-guyed television or radio transmission towers. Migratory birds generally fly at an altitude that would avoid ground structures, except when crossing over topographic features (e.g. ridge tops) or when inclement weather forces them down closer to the ground. A large number of birds migrate along the Pacific Coast, passing through the San Francisco Bay Area. The project area is within a known path for nocturnally migrating birds. However, there are no topographic or ecological features that would attract birds to this location or "funnel" them into the vicinity of the exhaust stacks or other elevated features of the project. Because of the relatively low structure height and lack of guy wires and aboveground transmission lines, the potential for bird collisions with stacks and other project structures is considered less than significant, and staff proposes no mitigation.

Cooling Effluent and Discharge

Process water for the SFERP power plant operations will be supplied by the City's combined sewage system and go through a new on-site water treatment plant. Water will be discharged to the plant wastewater sump, and then returned to the City's

combined sewer system. The SFERP project will draw process water from, and discharge wastewater into, the combined sewer system, therefore fish and other aquatic organisms in the San Francisco Bay will be unaffected by cooling effluent and discharge.

Nitrogen Deposition Impacts on Serpentine Soil Plant Communities

Serpentine soils in the San Francisco Bay Area, including those on San Bruno Mountain, support native grassland plant communities that sometimes provide habitat for rare and endemic species (Weiss 1999). Non-native annual grasses have invaded most grassland communities in California, but the highly specialized plant species adapted to nutrient-poor serpentinitic soils are often capable of resisting these non-natives. Serpentine-adapted natives can thrive in soils that are deficient in nitrogen, potassium, phosphorus, and other nutrients, offering a competitive advantage over the faster growing non-native annual species that have overtaken most of California's grasslands (Kruckeberg 1984).

That competitive advantage can be lost when nitrogen deposition from air pollution fertilizes these serpentine plant communities, and nitrogen ceases to be a limiting nutrient for plant growth. Under these circumstances, non-native annual grasses out compete the native species, threatening the biodiversity of these unique native plant communities (Weiss 1999). Studies have demonstrated that nitrogen deposition from air pollution can change serpentine plant community composition, with adverse effects to several species of threatened or endangered butterfly species that rely upon these native serpentine plants for food (Weiss 1999, USFWS 1998). The threshold of annual nitrogen deposition rates that can potentially influence ecosystem change to herbaceous plant communities is approximately five to six kilograms/hectare/year (kg/ha/year) (SFPUC 2005a). Increased fertilization and subsequent succession of endemic serpentine species to non-native grasses may be a problem in grassland habitats throughout the Bay Area (USFWS 1998).

Air emissions from SFERP's three combustion turbine exhaust stacks include nitrogen oxides (NOx), sulfur oxides (SOx), and particulates (PM10). Nitrogen oxide gases (NO, NO_2) convert to nitrate particulates (nitrates and nitrites) in a form that is suitable for uptake by most plants. The USFWS (USINTERIOR 2004a) expressed concern about the potential for SFERP to increase the load of NOx emissions and ammonia in the San Bruno Mountain area. The USFWS noted in their September 2, 2004 letter (USINTERIOR 2004a) that many regional listed plant and animal species occur on native grasslands (including serpentine grasslands) that could be adversely affected by increases in nitrogen deposition from the SFERP. These species include the largest documented population of the endangered callippe silverspot butterfly, the endangered mission blue butterfly, and the endangered San Bruno elfin butterfly. The USFWS also hopes to reintroduce the threatened bay checkerspot butterfly to San Bruno Mountain (USFWS 1998), and still considers it Critical Habitat for this species.

All four listed butterfly species depend on nectar from a variety of plants but require specific larval host plants. Mission blue butterfly larvae feed exclusively on lupine species (*Lupinus albifrons, L. variicolor*, and *L. formusus*), which grow in open grassland habitat, rocky slopes, and disturbed areas. California golden violet (*Viola*

pedunculata) is the host plant of the callippe silverspot butterfly and is found in a variety of habitats including open grasslands and chaparral. The host plant for the San Bruno elfin butterfly is the Pacific stone crop (*Sedum spathufolium*), which is typically found around rocky outcrops. The primary larval host plant for the bay checkerspot is dwarf plantain (*Plantago erecta*), an annual, native plantain. Habitat loss and fragmentation is the chief factor responsible for the contracting range and decreased numbers of these endangered butterfly species. The ongoing primary threat to the butterfly species at San Bruno Mountain is habitat loss due to the encroachment of non-native species and the expansion of coastal scrub vegetation (Kobernus 2004, cited in SFPUC 2005a). Experimental evidence from serpentine grasslands in San Mateo County indicates that increased levels of nitrogen and other nutrients allow invasion and dominance of non-native annual grasses, causing suppression of native forbs, including the dwarf plantain, the bay checkerspot's main larval food plant (USFWS 1998).

In addition to the special status butterfly species discussed above, San Bruno Mountain provides habitat for ten special status plant species (Table 2). Most of the ten rare plant species potentially occurring on San Bruno Mountain are associated with chaparral and coastal scrub communities as well as serpentine soils. Invasive non-native species have also been documented as threats to some of these species, such as white-rayed pentachaeta (USFWS 1998). The USFWS (USINTERIOR 2004a) also expressed concerns about potential impacts to rare plant species due to increased nitrogen levels from the SFERP.

In response to USFWS concerns about potential air quality impacts of the SFERP project to rare plants and butterflies, the applicant conducted an analysis to establish the existing levels of nitrogen deposition near San Bruno Mountain and to determine SFERP's additional contribution to this background level (CH2MHill 2004). This analysis demonstrated that the existing background nitrogen deposition rate at San Bruno Mountain is estimated to be 6.169 kg/ha/year. The average modeled nitrogen deposition from the SFERP project over the area is estimated to be 0.0059 kg/ha/year on San Bruno Mountain, a 0.0009 percent increase from ambient levels (see CH2MHill 2004 for the modeling methodology used to derive these figures). With the SFERP project, the total nitrogen deposition is 6.169 kg/ha/yr plus 0.0059 kg/ha/yr, or 6.175 kg/ha/year.

This modeling analysis did not take into account the NOx emission reduction credits being provided for the project, which will offset much of the nitrogen emissions increase from SFERP. The analysis also does not consider NOx emission reductions from the closure of existing power plants within the City. One of the chief goals of the SFERP is to close existing in-City generation, while maintaining the reliability of the electric system. Construction and operation of SFERP is one of several steps necessary to achieve this goal (Edwards 2004). According to the California Independent System Operator (ISO), construction of the SFERP, in combination with the construction of a number of planned transmission projects and a small generating facility at the San Francisco International Airport, will provide for the release of units at the Potrero Power Plant from the applicable Reliability-Must-Run (RMR) agreement (Edwards 2004). According to the San Francisco Action Plan negotiated by the City and the ISO, terminating the RMR contracts will force closure of the Hunters Point power plant; the

Potrero facilities could remain open but are not expected to be able to operate economically without a RMR contract, and would also likely close (Edwards 2004).

While the City is committed to closure of polluting power plants, the USFWS noted (USINTERIOR 2004a) that no firm timeline for these closures is provided. Given that no definite date can yet be offered for closure of these facilities, the applicant analyzed three potential future SFERP operating scenarios with differing combinations of plant closures and installation of emission controls. In the first scenario, it was assumed that both Potrero and Hunters Point power plants would continue to operate at historical levels, but that selective catalytic reduction (SCR) systems would be installed on the boilers to reduce NOx emissions. Installation of the SCR systems is required for these power plants to meet the 2006 NOx regulatory limits contained in the Bay Area Air Quality Management District's (BAAQMD) Rules and Regulations. In the second scenario, it was assumed that the Potrero Power Plant would continue to operate at historical levels, with Unit 3's NOx emissions controlled using SCR to meet the BAAQMD's regulatory NOx limit, and that the Hunters Point power plant would be shut down. In the third scenario, it was assumed that both the Potrero and Hunters Point power plants would be shut down. All scenarios include the NOx reductions from the offsets to be provided for SFERP.

Analysis of these three scenarios show that even with operation of SFERP and continued operation of the Hunters Point and Potrero power plants (with the required SCR control in place) emissions in southeast San Francisco would be reduced by more than 52 tons per year of nitrogen (CH2MHill 2004). The continued operation of the Potrero Power Plant, and the shutdown of the Hunters Point Power Plant would result in a net reduction in nitrogen emissions of approximately 86 tons per year. If both the Potrero and Hunters Point power plants are shut down, the area would see a net reduction in nitrogen emissions of about 169 tons per year.

At an informal meeting with the USFWS on June 22, 2005, Energy Commission staff discussed the modeling results (CH2MHill 2004) that demonstrate the SFERP project would result in an approximately 0.0009 percent increase from ambient nitrogen levels (Powers 2005). The USFWS asserts that current nitrogen deposition rates are already at levels affecting native grasslands in the Bay Area (within the five to six kg/ha/year expected to affect herbaceous plants), and noted that even slight increases in this deposition rate contribute to the cumulative adverse effects to rare and endangered species in the San Bruno Mountain area. Of even greater concern is the absence of a definite timetable and firm commitment to shutting down the existing polluting power plants.

Staff agrees that any contribution, even a minor one, to an existing cumulative impact to listed species is potentially significant and should be mitigated. The applicant proposes to purchase and surrender 47.5 tons per year of oxides of nitrogen emission reduction credits from the nearby Potrero Power Plant to mitigate the project's 39.8 tons of emission liability (see Air Quality section for a more detailed discussion of emission reduction credits). The surrendering of emission reduction credits would reduce the overall nitrogen emissions in the greater Bay Area and in the San Bruno Mountain area, and would eliminate the project's contribution to cumulative adverse impacts to listed species.

Cooling Tower Drift

Cooling tower drift is the fine mist of water droplets that escape the cooling tower's mist eliminators and are emitted into the atmosphere. Cooling towers concentrate the particulates (total dissolved solids) during the cooling process and produce a salt mist. At high concentrations, salts can physically damage leaf cells, which affect the photosynthetic ability of the plant. Other effects include blocking the stomata (leaf pores) so that normal gas exchange is impaired, as well as affecting leaf adsorption and solar radiation reflectance. These effects can reduce productivity in crops, trees, and sensitive special-status plant species in a deposition area. Studies performed by Lerman and Darley (1975) concluded that particulate deposition rates of 365 grams per square meter per year (g/m^2/year) caused damage to fir trees, but rates of 274 g/m^2/year and 400 to 600 g/m^2/year did not cause damage to vegetation at other sites. Pahwa and Shipley (1979) exposed vegetation (corn, tobacco, and soybeans) to varying salt deposition rates to simulate drift from cooling towers that use saltwater (20,000 to 25,000 parts per million [ppm]) in the circulation water. Salt stress symptoms on the most sensitive crop plants (soybeans) were barely perceptible effects at a deposition rate of 2.98 g/m^2/year (Pawha and Shipley, 1979). Assuming a particulate deposition rate of two centimeters per second and a maximum salt concentration of 0.10 micrograms per cubic meter ($\mu g/m^3$) (the maximum modeled annual average particulate matter concentrate from the cooling tower), the maximum expected deposition rate is 3.091 kg/ha/year or 0.309 g/m^2/year, which is significantly less than levels expected to cause barely perceptible effects to the most sensitive crop plants. Given the absence of crops or native plant communities near SFERP, no impacts to biological resources are expected due to cooling tower drift.

Cooling Effluent and Discharge

Process water for the SFERP power plant operations will be supplied by the City's combined sewage system and go through a new on-site water treatment plant. Water will be discharged to the plant wastewater sump, and then to the City's combined sewer system. The SFERP project will draw process water from, and discharge wastewater into, the combined sewer system, therefore no aquatic organisms in the San Francisco Bay or its tributaries will be affected by securing or discharging water during operations.

This use of tertiary-treated wastewater (recycled water) for power plant cooling and the discharge back to the wastewater system for further treatment will eliminate the chance of any impacts to the nearby aquatic biological resource, so staff does not propose any biological resources mitigation.

CUMULATIVE IMPACTS AND MITIGATION

The term "*cumulative impacts"* refers to two or more individual and similar effects which, when considered together, are considerable or which compound or increase other environmental impacts. No construction-related cumulative impacts will occur to biological resources because construction will occur entirely in areas that are paved or otherwise barren. However, operation of the SFERP would contribute, albeit a minor amount, to an ongoing significant cumulative impacts to listed plant and animal species on San Bruno Mountain from emissions from various sources including power plants. Any contribution, even a minor one, to an existing cumulative impact to listed species is

potentially significant and should be mitigated. To mitigate for the slight increase in nitrogen deposition resulting from the SFERP, emission reduction credits should be acquired and surrendered to mitigate the project's potential cumulative impacts.

COMPLIANCE WITH LORS

Appendix G of the California Environmental Quality Act (CEQA, Public Resources Code 21000 et seq.) includes a list of impacts that are likely to be determined to be *significant* if they occur. Regarding biological resources impacts, CEQA considers impacts to state or federal listed species, interference with fish and wildlife migration and loss of habitat to be *significant* if one or more of these impacts is likely to occur. As discussed above, operation of the SFERP will contribute to an ongoing significant impact (nitrogen deposition) to listed plant and animal species on San Bruno Mountain. Any contribution, even a minor one, to an existing cumulative impact to listed species is potentially significant under CEQA and should be mitigated if possible. To mitigate for the slight increase in nitrogen deposition resulting from the SFERP, the project owner has acquired emission reduction credits and must provide verification that they will be implemented before SFERP comes on line so that listed species on nearby San Bruno Mountain benefit from this air emission mitigation (Hammer 2005). If this is done, the project would be in compliance with the federal Endangered Species Act.

The project would use recycled water for power plant cooling, satisfying the San Francisco General Plan Water Resources Policy 3.3 regarding the use of recycled water and protection of Bay waters and resources.

NOTEWORTHY PUBLIC BENEFITS

Construction of the SFERP, in combination with the construction of a number of planned transmission projects and a small generating facility at the San Francisco International Airport, would clear the way for closure of the Hunters Point Power Plant, and possibly the Potrero Power Plant. If both the Potrero and Hunters Point power plants are shut down, the area would realize a net reduction in nitrogen emissions of about 169 tons per year (for more information see Air Quality analysis). This reduction in nitrogen emissions would benefit the listed species and their habitats on San Bruno Mountain. In addition, when either of these power plants is shut down, California will have fewer coastal power plants withdrawing cooling water from San Francisco Bay and less associated impingement, entrainment, and thermal discharge impacts on marine biological resources.

Another benefit of the SFERP is that the facility will incorporate an alternative cooling technology by utilizing recycled water rather than Bay water. As stated above, using an alternative cooling technology avoids the coastal ecosystem impacts associated with once-through cooling.

CONCLUSIONS

Construction of the SFERP would not have any significant direct impacts to sensitive biological resources and would be in compliance with applicable LORS. However, it

could potentially have indirect and cumulative air quality impacts to listed butterflies and plants found on San Bruno Mountain, approximately 4.5 miles south of the project area. Existing nitrogen deposition rates at San Bruno Mountain are 6.169 kg/ha/year. The SFERP project would contribute an additional 0.0059 kg/ha/year to this background level, resulting in net nitrogen deposition of 6.175 kg/ha/year, or a 0.0009 percent increase. This nitrogen deposition rate is already above the level that is thought to be impacting listed species on San Bruno Mountain. Operation of the SFERP may contribute to an ongoing significant cumulative impact (nitrogen deposition) to listed plant and animal species on San Bruno Mountain. Any contribution, even a minor one, to an existing cumulative impact to listed species is potentially significant and should be mitigated. Emission reduction credits from the nearby Potrero power plant have been acquired and will be surrendered to reduce the nitrogen deposition resulting from operation of the SFERP. The emission reduction credits would mitigate the project's minor contribution to cumulative impacts to listed butterfly and plant species on serpentine grasslands of San Bruno Mountain and be in compliance with LORS. The USFWS would require verification that the emission reduction credits have been secured and surrendered before the SFERP project comes on line (Hammer 2005).

PROPOSED CONDITIONS OF CERTIFICATION

Staff does not have any Biological Resources conditions of certification at this time. For more information about emission reduction credits required for the SFERP project, the Air Quality testimony contains Condition of Certification **AQ-38** regarding the provision of valid emission reduction credit banking certificates for 47.5 tons/year of oxides of nitrogen from the Potrero plant site to offset the anticipated oxides of nitrogen emissions for the proposed power plant project.

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CULTURAL RESOURCES

Beverly E. Bastian and Gary Reinoehl

SUMMARY OF CONCLUSIONS

Staff's cultural resources analysis has determined that the San Francisco Electrical Reliability Project will have no impact on significant historic standing structures, historic districts, or ethnographic resources. Impacts to archaeological resources will be discussed at a later time, when the applicant provides two reports on the archaeological survey of portions of the impact area, projected for September 14, 2005 (Carrier 2005). When the reports are received and the cultural resources inventory is complete, the analysis of SFERP's potential impacts to archaeological resources will be completed and mitigation measures proposed for all impacts that are potentially significant.

INTRODUCTION

This cultural resources assessment identifies the potential impacts of the San Francisco Electrical Reliability Project (SFERP) to cultural resources. Cultural resources are defined under state law as buildings, sites, structures, objects, and historic districts. Three kinds of cultural resources are considered in this assessment: prehistoric, historical, and ethnographic.

Prehistoric archaeological resources are those materials relating to prehistoric human occupation and use of an area. These resources may include sites and deposits, structures, artifacts, rock art, trails, and other traces of Native American human behavior. In California, the prehistoric period began over 10,000 years ago and extended through the eighteenth century to the time when the first Euro-American explorers settled in California.

Historical resources are those materials, archaeological and architectural, usually associated with Euro-American exploration and settlement of an area and the beginning of a written historical record. They may include archaeological deposits, sites, structures, traveled ways, artifacts, or other evidence of human activity. Under federal and state requirements, historical cultural resources must be greater than fifty years old to be considered of potential historic importance. A resource less than fifty years of age may be historically important if the resource is of exceptional importance.

Ethnographic resources are those materials important to the heritage of a particular ethnic or cultural group, such as Native Americans or African, European, or Asian immigrants. They may include traditional resource collecting areas, ceremonial sites, topographic features, cemeteries, shrines, or ethnic neighborhoods and structures.

For this project, staff provides an overview of the environmental setting and history of the project area, an inventory of the cultural resources identified in the project area, and an analysis of the potential impacts from the proposed project using criteria from the California Environmental Quality Act (CEQA). The primary concern is to ensure that all potential impacts are identified and that conditions are set forth that ensure that impacts are mitigated below the level of significance.

If cultural resources are identified, staff determines whether there may be a project-related impact to them. If the cultural resources cannot be avoided, staff determines whether any of the impacted resources is eligible for the California Register of Historical Resources (CRHR). If the impacted resources are eligible for the register, staff recommends mitigation measures that ensure that impacts to the identified cultural resources are reduced to a less than significant level.

LAWS, ORDINANCES, REGULATIONS, AND STANDARDS

Projects licensed by the Energy Commission are reviewed to ensure compliance with all applicable laws. For this project, in which there is no federal involvement,[1] the applicable laws are primarily state laws, in particular, CEQA. Although the Energy Commission has pre-emptive authority over local laws, it typically ensures compliance with local laws, ordinances, regulations, standards, plans, and policies.

CULTURAL RESOURCES Table 1
Laws, Ordinances, Regulations, and Standards

Applicable Law	Description
State	
Public Resources Code, section 21083.2	The lead agency may require reasonable steps to preserve a unique archaeological resource in place. Otherwise, the project applicant is required to fund mitigation measures to the extent prescribed in this section. This section also allows a lead agency to make provisions for archaeological resources unexpectedly encountered during construction, which may require the project applicant to fund mitigation and delay construction in the area of the find (CEQA).
California Code of Regulations, Title 14, section 15064.5, subsections (d), (e), and (f)	Subsection (d) allows the project applicant to develop an agreement with Native Americans on a plan for the disposition of remains from known Native American burials impacted by the project. Subsection (e) requires the landowner [possibly the project applicant] to rebury Native American remains elsewhere on the property if other disposition cannot be negotiated within 24 hours of accidental discovery and required construction stoppage. Subsection (f) directs the lead agency to make provisions for historical or unique archeological resources that are accidentally discovered during construction, which may require the project applicant to fund mitigation and delay construction in the area of the find (CEQA Guidelines).
California Code of Regulations, Title 14, section 15126.4(b)	This section describes options for the lead agency and for the project applicant to arrive at appropriate, reasonable, enforceable mitigation measures for minimizing significant adverse impacts from a project. It prescribes the manner of maintenance, repair,

[1] Cultural resources are indirectly protected under provisions of the federal Antiquities Act of 1906 (Title 16, United States Code, Section 431 et seq.) and subsequent related legislation, policies, and enacting responsibilities, e.g., federal agency regulations and guidelines for implementation of the Antiquities Act.

	stabilization, restoration, conservation, or reconstruction as mitigation of a project's impact on a historical resource; discusses documentation as a mitigation measure; and advises mitigation through avoidance of damaging effects on any historical resource of an archaeological nature, preferably by preservation in place, or by data recovery through excavation if avoidance or preservation in place is not feasible. Data recovery must be conducted in accordance with an adopted data recovery plan (CEQA Guidelines).
California Health and Safety Code, Section 7050.5	This code makes it a misdemeanor to disturb or remove human remains found outside a cemetery. This code also requires a project owner to halt construction if human remains are discovered and to contact the county coroner.
Local	
San Francisco General Plan, General Goals, Goal 1	The first goal of the General Plan is the protection, preservation, and enhancement of the economic, social, cultural, and esthetic values that establish the desirable quality and unique character of the city.
San Francisco General Plan, Preamble, Priority Policy 7	Landmarks and historic buildings should be preserved.
San Francisco General Plan, Preservation Element, Policy 7.0	Encourages historic preservation through local, state, and federal programs.
Central Waterfront Area Plan, Urban Design Section, Policy 10.3	Encourages the rehabilitation of architecturally or historically significant buildings with reuse potential.

SETTING

REGIONAL SETTING

The project area is located on the San Francisco Peninsula, a northward extension of the Santa Cruz Mountains that separates San Francisco Bay from the Pacific Ocean. The project area is in an industrial area within the City of San Francisco.

PROJECT, SITE, AND VICINITY DESCRIPTION

The project is located in the Potrero area of the western shoreline of San Francisco Bay about 1.5 miles south of the Bay Bridge. Potrero Hill rises to an elevation of about 300 feet, one-half mile northwest of the project. The project area is industrial, with the former Pier 70 shipyard complex and warehouses to the north, warehouses to the south, and the Pier 80 shipping complex to the southeast. An open field which will be developed as a MUNI Operations and Maintenance Facility is due west of the proposed plant site. A

residential area at the base of Potrero Hill known as the Dogpatch Neighborhood is northwest of the project area.

The proposed power plant site and laydown area are, at this time, undeveloped and unpaved (SFPUC 2005a:8.3-6). They consist entirely of land created by filling in the bay (see discussion under Land Modification, below). The undeveloped 4.0-acre plant site is bounded by 25th and Cesar Chavez Streets on the north and south, by the MUNI light rail development site on the west, and by the 8.5-acre undeveloped project laydown area to the east (SFPUC 2005a:2-2).

The proposed 115kV underground transmission line route totals 3,000 feet in length. The route exits north from the plant site into 25th Street and proceeds west along 25th to Michigan Street where it turns north. At 24th Street it turns west until it reaches Illinois Street where it turns north again. It continues on Illinois until it reaches the PG&E Potrero Switchyard. Two alternative routes into the yard are being considered: one which stays underground and goes directly into the switchyard from Illinois Street, and one which continues underground north on Illinois Street to 22nd Street and then east on 22nd to an underground/overhead transition structure into the switchyard (SFPUC 2005a:5-1). Except at the power plant and the switchyard, the entire route is in the city streets.

The proposed 900-foot-long underground natural gas pipeline runs from PG&E's 24-inch pipeline in Illinois Street, east on 25th Street to the west edge of the plant site, and south into the site. This location is not finalized and may change in the detail design phase based on avoidance of other buried utilities. The construction will be primarily open trench in a 50-foot-wide construction corridor (SFPUC 2005a:6-1).

The proposed plant requires two water lines, a process water supply line and a potable water supply line. The proposed process water line is about 4,000 feet long, consisting of 1,300 feet of pipe laid in existing collection boxes and 2,700 feet of new construction. Process water is taken from the city's combined sewer system by a new pumping station on Marin Street near the intersection of Mississippi Street. From the pumping station, the process water pipeline route runs east on Marin to Mississippi, then north on Mississippi to Cesar Chavez Street. On Chavez, the line runs east to Maryland Street, where it turns north. It turns west at the property boundary and runs to the water treatment plant that is part of the proposed power plant (SFPUC 2005a:7-1).

The proposed plant will tap into the city's potable water distribution system. There are two alternative routes for the proposed potable water supply line, one running 300 feet south from the southeast corner of the plant site boundary to an existing city water pipeline in Cesar Chavez Street, and another running 300 feet from the northwest corner of the plant site boundary to an existing city water pipeline in 25th Street (SFPUC 2005a:7-2).

Prehistoric Setting

Human settlement of the San Francisco Bay region could possibly date as early as 12,000 year BP (Before Present, based on the date of 1950) (Moratto 2004:76), but no evidence for this early occupation has been found. Until about 8,500 BP, there was no bay, rather the area was a valley crossed by the westernmost flood plain of the

Sacramento River, which flowed through the Golden Gate's gorge to reach the ocean "many kilometers west of the present shoreline" (Moratto 2004:xliv;219). The flooding of the bay was complete at about 6,000 BP, but before that time the project area was on a ridge, more distant from the ocean to the west than from the valley and river to the east and north.

The earliest documented occupation of the area between San Francisco and Monterey Bays dates to about 8,000 BP. Archaeological evidence indicates that, prior to 2,000 BP, this area was occupied by small groups of hunter-gatherers that used both terrestrial and marine resources (primarily shellfish). Large shellmound sites began to be occupied around San Francisco Bay around 2,500 BP. These sites appear to be habitation sites with dense shell midden, flaked and ground stone tools, bone tools, beads, ornaments, charmstones, and burials. The shellmound sites were occupied until the arrival of the Spanish. The principal marine resource exploited was shellfish, consisting mostly of oysters and bentnose clams. The most important terrestrial resource was acorns gathered from oak trees in the fall. Acorn processing (leaching out the tannic acid and grinding the meats into meal) required a significant amount of labor. Use of acorns as early as 2,500 BP indicates intensification of resource procurement at a relatively early period in prehistory in this area. The beginning of the use of the shellmound sites around San Francisco Bay may correspond with the arrival of Utian speaking people from the Delta area. These Utian speakers were the ancestors of the Costanoans who occupied the San Francisco Bay area when the Spanish arrived in the area (SFPUC 2005a:8.3-8).

Ethnographic Background

The project area is in territory occupied by the Native American group known to the Spanish and twentieth-century ethnographers as the Costanoan. The contemporary descendants of this group are members of the Ohlone Indian Tribe. The Costanoan group occupied the coast of California from San Francisco to Monterey and inland to include the coastal mountains from the southern side of the Carquinez Straits to the eastern side of the Salinas River south of Chalone Creek. Costanoan actually refers to a language family consisting of eight related languages. Each language was spoken by a different ethnic group within a recognized geographical area. The political units within each ethnic group were tribelets. Tribelet population varied from 50 to 500, with the average being about 200 people. Each tribelet had one or more permanent villages and several temporary camps within its territory. Collecting and hunting parties lived in temporary camps when obtaining resources within the tribelet territory away from the village (SFPUC 2005a:8.3-8).

The project area is in the territory occupied by speakers of the Ramaytush language. It is estimated there were about 1,400 speakers of this language in 1770. The Ramaytush speakers were divided into at least 10 tribelets. Each tribelet had a chief, and the office was inherited patrilineally. In particular, the chief fed visitors, directed ceremonial activities, organized hunting, fishing, and gathering, and directed warfare expeditions. Trade between the coastal Costanoan groups and the inland Yokuts groups involved the exchange of coastal products, such as mussels, abalone shells, dried abalone meat, and salt for inland products, such as piñon nuts (SFPUC 2005a:8.3-8).

Acorns from four species of oak were the most important plant food. Nuts, berries, seeds, and roots were also important. Costanoan groups practiced managed burning of chaparral to encourage sprouting of seed plants and improve browsing for deer and elk. The most important animals consumed were deer and rabbit. Steelhead, salmon, sturgeon, and lampreys were the most important fish gathered from San Francisco Bay, and oysters and clams were the most important shellfish (SFPUC 2005a:8.3-8).

People lived in thatched dome houses with rectangular doorways and a central hearth. Other structures in a village included sweathouses, dance enclosures, and an assembly house. Technology included tule balsa canoes, bows and arrows, and baskets. Chipped stone tools were made from chert obtained locally and obsidian obtained in trade with other groups (SFPUC 2005a:8.3-8, 9).

The Spanish established seven missions in Costanoan territory between 1770 and 1797. Due to introduced European diseases and a declining birth rate, the Costanoan population decreased from about 10,000 to 2,000 by 1832 (SFPUC 2005a:8.3-9).

Historic Setting

Spanish explorers reached San Francisco Bay in 1769. Soldiers and priests established the San Francisco Presidio (military post) and the Mission Dolores on the peninsula in 1776. The Spanish Mexican government in the early 1830s closed the missions. Former mission lands were granted to soldiers and other Mexican citizens for use as cattle ranches. The sons of Francisco de Haro, the first alcalde of San Francisco, were the grantees for the Rancho Potrero de San Francisco, including the project area. Ranching continued during the American period that began when the Treaty of Guadalupe Hidalgo was signed between Mexico and the United States in 1848. The Gold Rush of 1849 brought large numbers of Anglo-Americans to the area, resulting in the rapid expansion of San Francisco, which became the commercial entrepot for the region. Other towns in the Bay Area, such as Oakland and San Jose, developed rapidly after the arrival of the transcontinental railroad in 1869. Bay Area towns provided commercial, warehousing, financial, and manufacturing services for the agricultural and mining areas to the east. The earthquake and consequent fire of 1906 destroyed many nineteenth-century buildings, especially in San Francisco, and resulted in a period of reconstruction and expansion of buildings and infrastructure in the 1910s and 1920s (SFPD 2001a:7, 8; SFPUC 2005a:8.3-9, 10, 11).

Industrial Development

The wide expanse of the Mission Bay tidal flats north of the Potrero Point area discouraged settlement during the early American period, but the lack of development south of the flats, coupled with the deep water anchorage on the bay at the point, earmarked the area early in the city's history as an ideal location for the production of black powder, used for hard rock mining in the Sierras. E.I. du Pont de Nemours Company built the first black powder magazine on the south shore of the point in 1854 and initiated the industrial development of the Potrero area. Other black powder manufacturers followed, and soon other industries were attracted to the vacant land to the south. The encroachment of other industries and the growth of residential areas nearby made the black powder manufacturers move on to less populated areas by 1881 (SFPD 2001b:2; SFPUC 2005a:8.3-12), but from the late 1850s on, the Potrero area

became the center for San Francisco's industrial activity. Between 1850 and 1950 many other industries, especially those oriented to marine activities, established themselves in the area, including a rope factory, steel rolling mills, several shipyards, a slaughterhouse, a lighting gas manufacturing plant, an electrical generating plant, a sugar processing plant, a barrel factory, and a manufacturer of tin cans (SFPUC 2005a:8.3-10-8.3-11; SFPD 2001a:8-10).

San Francisco Cordage Manufactory (later Tubbs Cordage Company) was established in 1857 and became one of the area's largest employers in the 1870s. The factory included a 1,500-foot ropewalk and wharf that extended on a southeasterly angle, paralleling the shoulder of Potrero Hill, out into the bay (SFPD 2001a:8; SFPUC 2005a:8.3-10). The ropewalk was a long, narrow building on low piers where workers manually twisted fibers into long lengths of rope. These ropes were used in California's growing mining and shipping industries (Mirant2001DRes6:1-7). The facility shut down in 1962 (SFPD 2001b:3; SFPUC 2005a:8.3-12-8.3-13).

The first shipyard on Potrero point was built by John North in 1862, and other shipbuilders soon followed (SFPD 2001a:9). Rolled steel was produced for the first time on the west coast at Pacific Rolling Mills in 1868. The company also produced rails, nuts, bolts, washers, railroad spikes, and ship and locomotive parts. In 1883, another steel rolling mill, Union Iron Works, started operations right next door to Pacific Mills. Union Iron made machinery, but had chosen a site on the bay because it intended to go into shipbuilding. The United States Shipbuilding Company acquired Union Iron in 1902. When U. S. Shipbuilding went into receivership in 1905, Bethlehem Steel bought Union Iron Works and renamed it the San Francisco Yard. In 1911, Bethlehem Steel bought another iron works and shipbuilding company (formerly Pacific Rolling Mills) and added it to the San Francisco Yard. Just before World War I, several major Navy contracts led to the expansion of the Yard, resulting in the demolition of the Irish Hill residential area to the south in 1917. In 1938, the shipyard was renamed the Potrero Yard. Numerous warships used in both World War I and World War II were built at this shipyard. During World War II, the yard operated at maximum capacity, running 24 hours a day and employing 18,500 workers. Bethlehem Steel operated the yard until 1949 (SFPD 2001a:9, 11-12, 14; SECAL 2001b; SFPUC 2005a:8.3-10).

In 1871 the meat-processing firm of William Dunphy and Associates got a grant of tidelands in Islais Creek Cove and established "Butchertown" there. It was built on platforms and wharves supported by pilings in Islais Creek Cove. This area contained slaughterhouses, stables, offices, saloons, and boarding houses. Butchertown continued in operation until 1906 when it was destroyed during the earthquake. This part of the cove was later filled, and in the 1960s Islais Creek was converted to a manmade channel that ends at Interstate 280 (URS/Dames & Moore 2000:5-6).

Before electricity was generally available in San Francisco, gas was used for lighting. Gas was manufactured from coal or oil until natural gas became available in 1929. The City Gas Company established the first gas manufacturing plant at Potrero Point in 1872 (SFPUC 2005a:8.3-10; SECAL 2001c:5). In 1873, this company merged with two rivals to form the San Francisco Gas Light Company (SFPD 2001a:9-10). Ownership was transferred to San Francisco Gas & Electric in 1897 (SFPUC 2005a:8.3-11; SECAL 2001c:5), and this company constructed a large powerhouse, meter house, purifying

house, and machine shop and began using manufactured gas to generate electricity in 1899 (SFPD 2001a:10). This company became Pacific Gas & Electric in 1906. The Potrero gas plant was one of two in the city that survived the 1906 earthquake, and it was expanded as the city was rebuilt. The Potrero gas plant was converted from coal to oil in 1906. The Potrero gas plant was placed on standby status from 1929 to 1960. Most of it was subsequently demolished (SFPUC 2005a:8.3-11; SECAL 2001c:4-6).

Claus Spreckels established the California Sugar Refinery at Potrero Point in 1881 to refine and produce sugar made from Hawaiian sugar cane. It became the largest sugar refinery in the western United States, including wharves and several multistory brick structures that served as a wash house, a melt/filter house, and warehouses. The refinery changed ownership in 1881 and was renamed the Western Sugar Refinery. The refinery continued operations at Potrero Point until 1949, when it was purchased by its major competitor, the California and Hawaiian Sugar Refining Corporation (C & H). Judging the plant too costly to modernize, C & H demolished most of the refinery structures in 1951 (SFPUC 2005a:8.3-10-8.3-11; SECAL 2001c:R3-4-R3-7; SFPD 2001a:10).

In 1901 Spreckels built Station A, a large brick structure that housed a steam-powered electrical generating plant. It was soon purchased by San Francisco Gas & Electric, which was renamed Pacific Gas & Electric. Station A was the largest steam electric plant west of the Rocky Mountains between 1903 and 1913 and supplied almost all of San Francisco's electricity during this period. Later, when cheaper hydroelectric power became available, Station A was used to supplement the hydroelectric power during periods of peak use. With continuing equipment upgrades, Station A remained in operation until 1983 (SFPUC 2005a:8.3-11; SECAL 2001c:4).

The American Barrel Company, one of the earliest barrel-making firms in San Francisco, built its factory on Potrero Point in 1884. It moved from its original location to another Potrero area address in 1900 and continued operations until 1956 (SFPD 2001a:10).

The American Can Company was the last manufacturer to build a large plant in the Potrero Hill area. The factory started operations in 1916 and soon became a major employer, providing jobs for 1,200 workers in the 1930s, and expanding in size up through the early 1950s (SFPD 2001a:10).

Other, smaller businesses, especially those oriented toward maritime activities, grew up in the area around the turn of the century, including commercial fish processing plants, ship supply warehouses, a yeast and vinegar works, and a bone processing plant (SFPD 2001a:9).

Residential Development

Chinese fishermen had a presence on Potrero Point in the nineteenth century, but information on where and when is inconclusive. They may have had a village on the southern edge of the point in the 1850s or the 1880s (SECAL 2001a, Replacement AFC Section 8.3:8.3-16-8.3-17; URS/Dames & Moore 2000:4), and/or they may have occupied some ten buildings in Block 4229 of Minnesota Street around the turn of the century (SFPD 2001a:9). For persons of other ethnicities, the shipyards and other

Potrero Point industries provided many jobs, and these laborers needed housing nearby. After the completion of the Long Bridge (see below) in 1867, the Irish Hill and Dogpatch neighborhoods met this need, expanding greatly with single family houses, boarding houses, hotels, groceries, restaurants, and saloons. Irish Hill was a large rock outcrop northeast of the intersection of Illinois and 20th Streets. There were two zones to the Irish Hill neighborhood: the Hill, itself, on which many cottages crowded, and the nearby intersection, where residential hotels and saloons predominated. In the 1880s and 1890s, the inhabitants of Irish Hill were nearly all unskilled and semi-skilled male Irish laborers employed at the Pacific Rolling Mills or the Union Iron Works. The pre-World War I expansion of the San Francisco Shipyard forced residents out of Irish Hill, and the knoll was flattened in 1917.

The Dogpatch Neighborhood developed a little later than Irish Hill. Dogpatch was in the area between Mariposa and 24th Streets (north-south) and between Indiana and Third Streets (east-west). Building in this area was difficult because of the terrain—steep in places and subject to flooding in others, so the houses were more widely scattered than in Irish Hill. Also, the Atchison, Topeka & Santa Fe Railroad owned considerable land in Dogpatch, and the company was slow to sell or develop their lots. Dogpatch was distinct from Irish Hill in the nineteenth century, with less clustered, commonly owner-occupied houses whose inhabitants were mostly American-born skilled craftsmen employed in the boatyards and foremen at the ropewalk or rolling mills. In the 1880s, other ethnic groups had their own enclaves in the Potrero area as well, including Germans, Scots, and Russians. When Irish Hill was demolished in 1917, many of the inhabitants resettled in Dogpatch, erasing the earlier differences between the two neighborhoods (SFPD 2001a:13-15; SFPD 2001b:4, 10-11; SFPUC 2005a:8.3-13).

Land Transportation

In 1865, the need for a land connection between San Francisco's primary residential and business districts and the new industrial area on and near Potrero Point led investors to build a bridge, called the Long Bridge, across the Mission Bay mud flats, from the northern shore of Mission Bay south to the point. Soon after its completion in 1867, the Potrero and Bay View Railroad built a double-track, horse-drawn streetcar line across the bridge, facilitating the movement of people and goods between the city proper and the Potrero area. To extend the streetcar line further south, Kentucky (later Third) Street had to be constructed across a ridge of serpentine rock between Potrero Hill and Potrero Point. Massive blasting was required to accomplish this (the removed rock contributed to the filling of Mission Bay), but in 1868 the streetcar line crossed Potrero Point and Islais Creek Cove and continued south to the Bay View Racetrack. The segment across Islais Creek Cove was another bridge, called the Third Street Trestle (SFPD 2001a:8; SFPD 2001b:4; Mirant2001DRes6:1-7, Figure 220-2).

The railroads played an important role in the development of the Potrero industrial area. They laid tracks throughout the area to provide service to the city and to the factories of the area. They became residents themselves, building operational support facilities on and near the point, such as a depot, a roundhouse, warehouses, and a jetty (SFPD 2001b:4-5). But their most significant role was in the ownership and transformation of the land. In the late nineteenth and early twentieth centuries, the railroads were the Potrero area's largest landowners, thanks to the largesse of the state of California

(SFPD 2001a:19). In 1869, the state gave the Southern Pacific and Atchison Topeka & Santa Fe (AT&SF) railroads most of the Mission Bay tidal flats in exchange for agreeing to fill the flats now enclosed by the Long Bridge. The state also granted to AT&SF considerable land on Potrero Point, including what would become Dogpatch, where blasting the serpentine bedrock produced both buildable house lots and rock rubble to fill Mission Bay. The railroads profited greatly from their land development activities in the 1890s, but were slow to honor their obligation to fill the tidal flats. It was 1901 before Southern Pacific finished filling their part of Mission Bay and 1903 before AT&SF completed theirs (SFPD 2001b:4-5). The latter developed extensive tracks and warehouse facilities in the filled area adjacent to the old Long Bridge (SFPD 2001a:17; Mirant2001DRes6:1-7, Figure 220-4).

The railroad companies built two tunnels for their trains in the Potrero area in 1905 and 1907. They are part of a rail system called the Bayshore Cutoff. Still in use today, they run under Iowa Street between 18th and 22nd Streets and between 23rd and 25th Streets (SFPD 2001b:19).

In 1909 the Western Pacific Railroad (WPRR) built a jetty and wharf 1,500 feet out from the shoreline (located roughly at Minnesota Street at that time) and ran tracks out along 25th Street into the bay. The jetty was in the same location as an earlier wharf whose owner or purpose are unknown, but which appears on the 1869 USCS map of the area (SFERP 2004v:4; Mirant2001DRes6:1-7, Figure 220-2). The 1909 jetty and wharf were built to facilitate WPRR's transport of cargo, primarily dry goods, across the bay to Oakland via an unobstructed shipping channel established for the railroad by the Harbor Commission. The tracks ran on the jetty, while a wooden pier on pilings provided docking for the ferries which transported rail cars back and forth across the bay. Several wood-framed buildings (offices, sheds, storage) were also built along the jetty over the years, and there was a "Repair Track Building" (AGS 1999:2.4). After 1935, WPRR filled the area north of the wharf (see below) and added extensive trackage for a switchyard for ferried cars. The wharf and tracks continued in operation until 1978, although the ferry service back and forth to Oakland ended in 1975 (URS/Dames & Moore 2000:4-5; SFPUC 2005a:8.3-14; AGS 1999:2.4).

Land Modification

Individual lot owners began the filling of Mission Bay and Islais Creek Cove as a means of increasing the available land in the Potrero industrial area in the 1850s (SFPD 2001a:17). But filling became a public mandate after the Long Bridge and the Third Street Trestle were completed in 1867 (SFPD 2001b:4). As discussed above, the state gave two railroad companies the submerged lands of Mission Bay in exchange for filling them. The two trestle structures to the north and south of Potrero Point provided eastern perimeters toward which the filling from the shoreline would proceed and from which additional filling could be staged. As a result, Mission Bay and Islais Creek Cove progressively shrank as they were enclosed from all sides. Filling to extend Potrero Point itself was from the shoreline outward in all directions (Mirant2001DRes6: Figures 220-2, 220-3, 220-4). As noted above, Mission Bay filling was completed in 1903. Much of the fill material for these efforts came from the Potrero area itself, which had a rugged natural terrain unsuited to development. Blasting and hauling away many tons of the bedrock and using it to fill in low places or to extend the shoreline was an arduous task

undertaken individually by those industries wanting their existing land to be usefully flat and/or wanting to reclaim usable land from the bay. Potrero Point ceased to be a peninsula by 1950, when the WPRR filled the area north of their jetty at 25th Street until it connected to the Potrero Power Plant property. The filling of Islais Creek Cove occurred later and in stages, in the 1910s, in the 1940s, and, most recently, in the 1960s, when 68 acres were filled in, the creek was confined to a man-made channel, and Cesar Chavez (then Army) Street was extended east in connection with the Pier 80 terminal. (SFPD 2001a:18; URS/Dames & Moore 2000:5; SFPUC 2005a:8.3-14). Today, it is estimated that the Central Waterfront area consists of about one-third natural ground (albeit extensively leveled) and two-thirds filled land (SFPD 2001a:16-18).

Based on a site history done for the MUNI site to the west of the proposed power plant project site (SFERP 2005p), the application and the field survey report represent the plant site as progressively reclaimed from Islais Creek Cove between 1931 and 1966. After 1935, WPRR is said to have filled the north half of the "property" (it is unclear what property is being discussed) and built a switchyard to serve its ferry terminal. By 1947, a series of railroad tracks, presumably on fill, was covering about the northern third of the project site. The rest of the project area was filled in between 1955 and 1966 (SFPUC 2005a:8.3-14; SFERP 2005n:19).

This reconstruction of the evolution of the proposed plant site does not include the information that the initial fill was placed before 1915 (AGS 1999:2.12). The site may even possibly have its beginning before 1869 as an unidentified wharf (gone from later maps), but it certainly got its permanent foundation as WPRR's 1909 jetty and wharf (both discussed above under Transportation). These structures are depicted on the 1869 U. S. Coastal Survey's San Francisco Peninsula map and the U. S. Geological Survey's 1915 quadrangle map, respectively (Mirant2001DRes6: Figures 220-2, 220-4). WPRR's jetty and wharf are shown (but not labeled as such) as the "approximate location of 1935 shoreline" on Figure CR-174 (SFERP 2005n), which purports to depict the progression of the filling of the project site. That figure shows that the 1935 jetty occupies about the northern third of the project site and about the northern third of the laydown area. The applicant's representation of the post-1935 expansion of the jetty, by filling to the northwest and south and the construction of various buildings on the jetty (shown on the 1944 Sanborn map of the area), completes the picture of the evolution of the project site and appears to be accurate. But it should be recognized that approximately the northern third of the proposed plant site is created land nearly 100 years old and, despite its lack of development at this time, that northern third was heavily used by a railroad for nearly 70 years.

Resources Inventory

Literature/Records Search and Native American Contacts

The applicant's records check and literature search included all known cultural resources within a one-quarter-mile radius of the proposed plant site, laydown area, and appurtenant linear facilities. The object of the search was to identify known prehistoric and historical terrestrial and submerged archaeological sites, historic architectural structures, and Native American sacred sites in the project area (SFPUC 2005a:8.3-6-

8.3-7). Records and relevant previous cultural resources studies for the project area were accessed (SFPUC 2005a:8-13, 8-14), including:

- A cultural resources study of the area around an earlier proposed expansion of the Potrero power plant (see Wirth 1979);
- A cultural resources inventory of the PG&E Potrero power plant site was part of an EIR completed for the sale of the Potrero and other power plants (see ESA 1998);
- A 2000-01 survey of the Central Waterfront area done by the San Francisco Department of Planning (see SFPD 2001a);
- Energy Commission Final Staff Assessment of cultural resources (CEC 2002a:Section 5.4) for the proposed Potrero Unit 7 power plant project, which incorporated information from various sources relating to this project's application for certification, including Mirant (Mirant2001DRes4 and Mirant2001DResCBE), SECAL (2000a, SEP2000DRes1, SEP2000DRes2, 2001a, 2001b, 2001c, and 2001 d), and URS/Dames and Moore (2000);
- A cultural resources study for the original SFERP on the Potrero Power Plant property (although this study, per se, is not cited; see SFERP 2004a);
- A search for records (#NWIC 04-687) at the California Historical Resources Information System (CHRIS) at Sonoma State University in January, 2005 (SFERP 2005n:Appendix A);
- A review of the public on-line shipwrecks database of the State Lands Commission (SLC), and a search of the SLC's non-public shipwreck database (SFERP 2005n:10);
- A search of the Native American Heritage Commission's (NAHC) database of Native American sacred lands (SFERP 2005n, Attachment CR-161:Appendix B);
- An NAHC-provided list of Native Americans having historic ties to the Potrero area, to whom the applicant sent a letter on May 27, 2005, asking them if they were aware of any cultural resources which could be affected by the proposed project (SFERP 2005n, Attachment CR-161:Appendix B).

On April 26, 2005, Energy Commission staff also obtained from the NAHC the names and addresses of Native Americans interested in the Potrero area. On May 12, 2005, a letter was sent to all listed Native Americans informing them of the project and asking that they contact staff if they had any concerns about the project's potential effects on cultural resources.

The applicant made an additional effort to obtain information on cultural resources from Native Americans, telephoning those on the NAHC list on July 11 and again on July 13, 2005, and leaving messages on both occasions with a number to call for further information. The applicant had received no responses to this outreach by July 18, 2005 (SFERP 2005y:Data Request 163).

At an Energy Commission public Information Hearing on the proposed SFERP, held in San Francisco on May 6, 2005, a self-identified representative of the Ohlone Tribe, Francisco Da Costa, was a participant. Da Costa informed staff that there is a large

prehistoric archaeological site south of the proposed process water pumping station for the project, near the United Parcel Service depot. Staff raised this issue for discussion at the Workshop which followed the public hearing on May 6, and at that time asked the applicant to investigate this site and report on it to staff.

The applicant telephoned Francisco Da Costa on July 13, 2005, asking about the Native American archaeological site locations of which Da Costa had indicated knowledge. Da Costa identified the banks of Islais Creek and the shore zone of San Francisco Bay as archaeologically sensitive areas where prehistoric Native American burials might be found, but he could be no more specific about site locations (SFERP 2005z:Data Response CR7-1).

Field Surveys

For the proposed SFERP, the potential areas which the applicant might have surveyed for archaeological resources were the power plant parcel, the laydown area, the process water pumping station site, and the routes of the linear facilities. The applicant explained that the water pumping station site or the linear facility routes were not surveyed, however, because these structures are to be installed in existing collection boxes where no new archaeological resources can be disturbed, or in trenches within the existing street network where soils are paved over and therefore not visible (SFERP 2005n, Attachment CR-161:29).

The proposed plant site was physically surveyed for archaeological resources on February 21, 2005 (SFERP 2005n, Attachment CR-161:29), and the laydown area was surveyed in July, 2005. The findings from these surveys will be discussed at a later time, when the applicant provides the revised report, projected for September 14, 2005 (Carrier 2005).

No new historic building or structure inventory or evaluation was done in the field for the current project (SFERP 2005n, Attachment CR-161:26).

The geotechnical boring carried out by the applicant to provide data to aid in the design of the foundation of the proposed plant presented an opportunity for a limited kind of archaeological testing of the proposed plant site. The boring was monitored by a qualified archaeologist to assess the possibility of encountering submerged/buried cultural resources under the fill on the site. The applicant has indicated that the archaeologist's report of the findings from the borings will be submitted to the Energy Commission on September 14, 2005 (Carrier 2005).

Identified Prehistoric and Historical Archaeological Resources

The Wirth Associates study (Wirth 1979) did not identify any archaeological resources on the proposed project site or along linear routes, but it concluded that there was a "low to moderate potential for buried prehistoric resources and a moderate to high potential for buried historical resources (SFPUC 2005a:8.3-13). The ESA inventory found no archaeological resources on the Potrero power plant site, but concluded, like Wirth Associates, that there was low to moderate potential for prehistoric resources and a moderate to high potential for buried historical resources on the site (SECAL 2000a:8.3-10).

The applicant cited a February, 2004, CHRIS records search (NWIC 03-548) done in connection with a cultural resources study for the location of the original proposed SFERP on the Potrero Power Plant property, and a January, 2005 search (NWIC 04-687) for the location of the proposed SFERP. Neither search produced records of known archaeological resources on or adjacent to the project site or construction laydown area. The only CHRIS-listed archaeological resource located within a mile of the project plant site was a prehistoric archaeological site, CA-SFR-15; P-38-000015), located about .5 miles south of Marin Street (SFPUC 2005a:8.3-14).

The Energy Commission Final Staff Assessment of cultural resources for the suspended Potrero Unit 7 power plant project summarized the archaeological findings from geotechnical boring and sediment sampling along the proposed alignments for the water discharge structures of the proposed Potrero Unit 7. Because of the possibility of there being submerged/buried cultural resources in the bay, an archaeologist observed the borings, and found bits of wood, later identified as eucalyptus, in boring No. B-7, at a depth of 9 to 23 feet. Other bits of wood were found in 8 out of 31 sediment samples. These findings were interpreted as remnants of the East Wharf/Sugar Dock associated with the Western Sugar Refinery. No other historical material was found (CEC 2002a:Section 5.4-10).

For the earlier Potrero Unit 7 cultural resources inventory, a record search was conducted in 2000 to identify underwater cultural resources, such as shipwrecks, that could be impacted by construction of discharge pipelines in the bay. The record search sought information on file at the State Lands Commission (SLC), U.S. Army Corps of Engineers, San Francisco Bay Conservation and Development Commission, and the Port of San Francisco. No shipwrecks or other underwater cultural resources were identified as a result of this earlier record search (SEP2000DRes2:#155).

For the proposed SFERP, in 2005, the applicant again reviewed the SLC's on-line public shipwrecks database of the State Lands Commission, without positive results. In June, 2005, SLC staff conducted a search of their non-public shipwreck database for the applicant and identified only one shipwreck anywhere near the SFERP area. That vessel was the *Fannie Adele*, which in 1904 blew up at the 16th Street pier and, when cut loose, drifted ablaze toward the Golden Gate. The applicant included the information that the SLC staff person considered it unlikely that the *Fannie Adele* sank in the part of the bay where SFERP will be built (SFERP 2005y:Data Request 175).

The findings of the archaeological survey report of the proposed SFERP plant site and laydown area will be discussed at a later time, when the applicant provides the revised report, projected for September 14, 2005 (Carrier 2005).

The underground transmission line, natural gas pipeline, and process and potable water pipeline routes, and the process water pumping station site were not surveyed because they are in city streets, under pavement. Therefore, no archaeological deposits were identified by archaeological survey.

The applicant expects that the filled parts of the project impact area will be of low sensitivity for either prehistoric or historical archaeological resources, but that those

parts of the project area that are on the landward side of the prehistoric shoreline will be of high sensitivity for prehistoric archaeological resources (SFPUC 2005a:8.3-12).

Identified Historic Standing Structures

The applicant cited a February, 2004 CHRIS records search (NWIC 03-548) done in connection with a cultural resources study for the location of the original proposed SFERP on the Potrero Power Plant property, and a January, 2005 search (NWIC 04-687) for the location of the proposed SFERP. Neither search produced records of known architectural resources on or adjacent to the project site or construction laydown area. The only CHRIS-listed architectural resources located within a mile of the project plant site was the Islais Creek Sewage Treatment Plant (P-38-004274), located about .6 mile south of Marin Street, which is eligible for the National Register of Historic Places (NRHP) (SFPUC 2005a:8.3-14).

In addition to CHRIS, previous inventories and evaluations of historic structures in the Central Waterfront area were consulted. These included a 1994 evaluation of structures in the Southern Waterfront survey area that included the adjacent Union Iron Works, Pier 70 Historic District by Carey & Co., Inc. (SECAL 2001b), a 1998 records search carried out for an Environmental Impact Report in connection with a proposed sale of PG&E power plants (ESA 1998), a 1999 evaluation of structures on the Potrero Power Plant parcel by Ward Hill and Laurence Shoup (SECAL 2001c), and a 2001 historic architecture survey done for the previous Potrero Power Plant Unit 7 application (SECAL 2001a, Replacement AFC, Section 8.3:20). The 1998 study identified several industrial buildings more than 50 years old in the vicinity of the Potrero Power Plant, mostly located west of Third Street, and highlighted the I. M. Scott School, built in 1895 and located at 1060 Tennessee Street, as San Francisco Historical Landmark 138 (SFPUC 2005a:8.3-15). In January, 2001, Michael Corbett, architectural historian, and Denise Bradley, landscape historian, did the Potrero Unit 7 project historic architecture windshield survey, which covered the power plant parcel and all properties directly adjacent to the power plant parcel, including the Pier 70 area. They also drove along the underground transmission route, in order to provide a characterization of the types and ages of the structures along the route (SECAL 2001a, Replacement AFC, Section 8.3:20; SECAL 2001a, Appendix R:R-10).

All these resources are included in the more recent Central Waterfront survey, carried out for the San Francisco Department of Planning in 2000-01. The Central Waterfront survey was bounded by "16th Street on the north, Interstate 280 to the west, Islais Creek to the south and San Francisco Bay to the east" (SFPD 2001a:5). The survey identifies buildings and structures that are eligible for the NRHP and the CRHR, as well as those resources significant at the local level. The survey recorded 243 buildings having status codes indicating an undetermined status or either actual or potential eligibility for some register (the NRHP, or the CRHR, or local historical listing) (SFPUC 2005a:8.3-7).

The survey identified four potential historic districts: the Dogpatch Neighborhood, Pier 70 (Bethlehem Steel's San Francisco Yard), Bridges and Tunnels, and Industrial-Type Buildings included within the Central Waterfront District. Dogpatch and Pier 70 have been officially recognized as historic districts within the Central Waterfront area (SFPUC 2005a:8.3-6-8.3-7). Dogpatch is a fully documented district either designated or eligible

for designation as a local historic district (SFPD 2001a:25), and its survey was endorsed by the City and County Planning Commission in December, 2001 (SFERP 2004t, Attachment CUL-22:5). Pier 70 is also a fully documented district that may be eligible for the NRHP (SFPD 2001a:25). The Bridges and Tunnels district and the Industrial-Type Buildings district are not officially recognized, but the Central Waterfront survey indicates they are fully documented, and potentially eligible for the NRHP under Criterion A, at the local level of significance (SFPD 2001a;26).

A larger potential historic district, encompassing the four districts just discussed and corresponding to the boundaries of the Central Waterfront survey, has also been fully documented, and a DPR District record has been prepared for it (SFPD 2001a; SFERP 2004t, Attachment CUL-23). Although the district has not been officially recognized, the City Planning Commission moved to endorse the Central Waterfront Cultural Resources Survey and directed that this survey, along with the one for Dogpatch, be forwarded to the Office of Historic Preservation for inclusion in the CHRIS (SFERP 2004t, Attachment CUL-22:5).

The Energy Commission Final Staff Assessment (FSA) of cultural resources for the proposed Potrero Unit 7 power plant project focused on three groups of structures, constructed more than 45 years ago, within the impact area of that now postponed project. These were the structures on the Potrero Power Plant associated with the Station A power plant and the Potrero gas plant, the structures on the adjacent parcel to the north that are part of the Pier 70 Historic District, and the structures on the parcel to the south of the postponed power plant project that were part of the defunct Western Sugar Refinery (CEC 2002a:5.4-10-5.4-12). The easternmost two of the latter structures were steel-frame warehouses, which were formerly used to store sugar.

The Pier 70 structures are three to four blocks away from the proposed SFERP plant site, and the power plant structures are two blocks away, with a tall building intervening. The sugar warehouses, however, are about 1.5 blocks from the proposed SFERP plant site, with only relatively low buildings and the bay between the two locations. A historic architecture assessment of the two old warehouses was done in January, 2001, for the licensing application of the Potrero Unit 7 power plant (SECAL 2001d). That source provides the information that the western warehouse was built in 1923, and the eastern one in 1929. The two retain good integrity. The architectural historians evaluated both buildings as eligible for listing, at the local level of significance, on both the NRHP, under Criterion A, and the CRHR, under Criterion 1 (SECAL 2001d:R3-8).

Identified Ethnographic Resources

The NAHC informed the applicant that no known Native American cultural resources in the project area were found in the NAHC's sacred lands database. The letters the applicant and Energy Commission staff sent out to Native Americans have so far received no responses. In data request # 163, staff requested that the applicant follow up their letter to Native Americans with phone calls, but the applicant has not notified the Energy Commission of any results yet.

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

Various laws apply to the evaluation and treatment of cultural resources. CEQA requires the Energy Commission to evaluate resources by determining whether they meet several sets of specified criteria. These evaluations then influence the analysis of potential impacts to the resources and the mitigation that may be required to ameliorate any such impacts.

The CEQA Guidelines provide a definition of a historical resource as a "resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR", or "a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting the requirements of Section 5024.1 (g) of the Public Resources Code," or "any object , building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the agency's determination is supported by substantial evidence in light of the whole record." (California Code of Regulations, Title 14, section 15064.5(a)). Historical resources that are automatically listed in the CRHR include California historical resources listed in or formally determined eligible for the NRHP and California Registered Historical Landmarks from No. 770 onward (Public Resources Code, Section 5024.1(d)).

Under the CEQA guidelines, a resource is generally considered to be historically significant if it meets the criteria for listing in the CRHR. These criteria are essentially the same as the eligibility criteria for the NRHP. In addition to being at least 50 years old,[2] a resource must meet at least one of the following four criteria: is associated with events that have made a significant contribution to the broad patterns of our history (Criterion 1); or, is associated with the lives of persons significant in our past (Criterion 2); or, that embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values (Criterion 3); or, that has yielded, or may be likely to yield, information important to history or prehistory (Criterion 4) (Public Resources Code section 5024.1). In addition, historical resources must also possess integrity of location, design, setting, materials, workmanship, feeling, and association (California Code of Regulations, Title 14, section 4852(c)).

Even if a resource is not listed or determined to be eligible for listing in the CRHR, CEQA allows the lead agency to make a determination as to whether the resource is a historical resource as defined in Public Resources Code sections 5020.1 (j) or 5024.1. Whether a proposed project will cause a substantial adverse change in the significance of historical resources is the issue that staff analyzes to determine if the project may have a significant effect on the environment.

[2] The Office of Historic Preservation's Instructions for Recording Historical Resources (1995) endorses recording and evaluating resources over 45 years of age to accommodate a five-year lag in the planning process.

DIRECT/INDIRECT IMPACTS AND MITIGATION

In the abstract, direct impacts to cultural resources are those associated with project development, construction, and coexistence. Construction usually entails surface and subsurface disturbance of the ground, and direct impacts to archaeological resources may result from the immediate disturbance of the deposits, whether from vegetation removal, vehicle travel over the surface, earth-moving activities, excavation, or demolition of overlying structures. Construction can have direct impacts on historic standing structures when those structures must be removed to make way for new structures or when the vibrations of construction impair the stability of historic structures nearby. The co-existence of new structures amid old structures can have direct impacts on historic structures when the new structures are stylistically incompatible with their neighbors and the setting, and when the new structures produce something harmful to the materials or structural integrity of the historic structures, such as emissions or vibrations.

Generally speaking, indirect impacts to archaeological resources are those which may result from increased erosion due to site clearance and preparation, or from inadvertent damage or outright vandalism to exposed resource materials due to improved accessibility. Similarly, historic structures can suffer indirect impacts when project construction creates improved accessibility and vandalism or weather exposure becomes possible.

Ground disturbance accompanying construction at the proposed plant site, along the proposed linear facilities, and at the proposed laydown area has the potential to directly impact archaeological resources, unidentified at this time. The potential direct, physical impacts of the proposed construction on unknown archaeological resources are commensurate with the extent of ground disturbance entailed in the particular construction. This varies with each component of the proposed project. Placing the proposed plant into this particular setting could have a direct impact on the integrity of association, setting, and feeling of nearby standing historic structures.

Construction Impacts and Mitigation

Direct Impacts on Archaeological Resources

At this time, staff tentatively agrees with the applicant that no significant known archaeological resources have been identified where the proposed project is to be built. When the combined archaeological survey report of the plant site and laydown area is submitted, the inventory of all significant archaeological resources in the project area will be complete, and the applicant's finding will probably be confirmed by staff.

Because the proposed project development and construction require subsurface disturbance of the ground in an area (the original shoreline) that has been greatly utilized in both prehistory and history (as indicated in the sections on prehistoric and historic settings), the applicant and staff agree that SFERP has the potential to adversely affect presently unknown archaeological resources. Records review and historical research indicate that the potential for encountering unknown archaeological resources during construction is high in a few parts of the project's construction zones, but mostly is pretty low.

In general, staff expects that the fill used to create the land which constitutes most of the project construction zones (the plant site, Cesar Chavez Street, 25th Street, and Illinois Street) contains considerable historic-period material, i. e., artifacts and lots of construction debris. The specific sources of the fill are unknown, and the artifacts have been jumbled and redistributed in the soil and debris matrix in the process of being dug up, hauled, and laid down, destroying the spatial relationships among the artifacts and soils and negating the information values of these deposits. Consequently, fill deposits as archaeological resources cannot meet criterion 4 of the CRHR and so cannot be considered a historical resource that requires mitigation. The applicant, however, provided information on one possible resource—scuttled boats—which could be found in the fill and which might be considered historical resources. The reference librarian of the San Francisco Maritime National Historic Park informed the applicant that it was a relatively common practice to tow boats to areas of the bay which were being filled, salvage them, burn them to the waterline, and then fill around and over them. The buried boats helped stabilize the fill (SFERP 2005n:10). Excavations at the plant site for piping or pilings and trenching for the underground transmission line on 25th, Michigan, 24th, and Illinois Streets, for the natural gas pipeline on 25th Street, and for the process water pipeline on Cesar Chavez and Maryland Streets might encounter the remains of a scuttled boat in the fill. Procedures for identifying, evaluating, and possibly mitigating impacts to such resources must be put into place by means of conditions of certification (see Proposed Conditions of Certification, below).

Ground disturbance resulting from construction at the proposed plant site and the use of the laydown area has low potential to directly impact archaeological resources, unidentified at this time. It is not known whether the existing ground surface of the proposed power plant site and laydown area is the same as that on which the Western Pacific Railroad had its switchyard and wharf. Since the railroad tracks and structures were removed nearly 30 years ago, the old surface could have been scraped away or it could have been covered with additional fill or both. So whether or not any buried archaeological remains of those facilities still exist on the plant site cannot be predicted. The probability is low that such remains will be encountered during construction of the plant, but procedures for identifying, evaluating, and possibly mitigating impacts to such resources must nonetheless be put into place by means of conditions of certification.

In addition, the entire plant site was once about ten feet under water (URS/Dames and Moore 2000:Figure 3), and there is some chance that submerged prehistoric cultural resources may now be buried under the fill which the WPRR used to create the land where the plant site is. The applicant has recognized the possibility that prehistoric shell middens or other sites from a time period when the bay's water level was lower (pre-6000 B.P.) could exist under the fill (SFERP 2005n:10). Also, submerged historic-period cultural resources normally considered as underwater cultural resources, such as sunken boats, lost cargoes, or collapsed wharves, may now be buried under the fill at the plant site. The applicant has also recognized the possibility that historic-period resources, such as a boat or shipwreck or dumped refuse, could exist under the fill (SFERP 2005n:10). Procedures for identifying, evaluating, and possibly mitigating impacts to such resources must be put into place by means of conditions of certification.

Construction of the project's new process water pumping station (PWPS) on Marin Street will require excavation of a hole about 17 feet by 29 feet by 20 feet deep, with

additional trenching in the adjacent area for pipes and electrical wiring. This ground disturbance has the potential to directly impact archaeological resources, unidentified at this time, to the extent of the area and depth of the excavation.

As the applicant states, installing the process water pipeline in existing boxes will not disturb unidentified cultural resources, but other water pipe installations, which require new, open-trench excavation, could disturb such resources. These installations include the short process-water segment on Marin Street, the long process-water segment from the Indiana Street-Chavez Street intersection east to the new treatment plant, and both alternatives for the potable water lines: north from Chavez Street or south from 25th Street. In addition, for the process-water line, trenchless methods, such as jack-and-bore or micro-tunneling, may be used where Chavez crosses Illinois Street and Third Street (beneath the MUNI light rail). Open trenches for new construction for both water lines will be two to three feet wide and five or more feet deep, depending on the stability of the soil and on the presence of subsurface obstructions. Jack-and-bore construction entails driving a pipe horizontally underground between an entrance pit and an exit pit. The required entrance pit is 30 feet wide, 15 feet long, and six or more feet deep (SFERP 2005n:2-3; (SFPUC 2005a:7-1, 7-2). The ground disturbance of trenching or jack-and-bore construction for the water lines has the potential to directly impact archaeological resources, unidentified at this time, to the extent of the area and depth of the trenches and entrance pits.

Staff believes that construction of the PWPS and of the 80 feet of new process water pipeline on Marin Street (between the PWPS and the collection box on Mississippi Street) has the highest potential for encountering unknown prehistoric resources of any of SFERP's construction areas. Staff has concluded this because prehistoric and ethnographic studies (see Prehistoric Setting and Ethnographic Background, above) have shown that the original bay shoreline was a resource zone heavily exploited by Native Americans prior to the arrival of the Mexicans and Americans, and that prehistoric and ethnographic sites are more likely to occur along the old shoreline. For their extent on Marin Street, the PWPS and pipeline excavations coincide with the prehistoric shoreline (SFERP 2005n:Figure CR-178), and thus are the most likely to encounter unknown prehistoric resources. The applicant also recognized the possibility of encountering remnants of the Third Street Trestle where the trench for the process water pipeline running along Cesar Chavez Street crosses Third Street, but noted the lack of success at locating that historical archaeological feature when Wirth Associates dug a deep test trench looking for it in the area of Third and 23rd Streets (SFPUC 2005a:8.3-19). Procedures for identifying, evaluating, and possibly mitigating impacts to such resources must be put into place by means of conditions of certification.

Construction of the underground transmission line entails digging a trench along almost the entire route through the streets. Open trenches will be five to six feet wide and six or more feet deep, depending on the stability of the soil and on the presence of subsurface obstructions. Jack-and-bore construction, which may be used at the intersection of 24th and Illinois Streets, requires an entrance pit 30 feet wide, 15 feet long, and six or more feet deep (SFERP 2005n:3). The ground disturbance of trenching or jack-and-bore construction for the underground transmission line has the potential to directly impact archaeological resources, unidentified at this time, to the extent of the area and depth of the trenches and exploration pits, but that potential is low.

In particular, the underground transmission line trench on Illinois Street about halfway between Humboldt and 23rd Streets intersects the prehistoric shoreline (SFERP 2005n:Figure CR-178; and see discussion above for the PWPS) and consequently has some potential for encountering unknown prehistoric resources. That probability is slight, both because the trench intersects rather than parallels the old shoreline (the area of old shoreline that could be exposed is small) and because intensive historic-period utilization of this area could have greatly disturbed or obliterated evidence of earlier Native American activities. Also, the intersection of Illinois and 23rd Streets could have some buried remains of the Tubbs Cordage Company ropewalk, which the underground transmission line trench could encounter, especially if a jack-and-bore pit is used in this location. Procedures for identifying, evaluating, and possibly mitigating impacts to such resources must be put into place by means of conditions of certification.

Construction of the gas pipeline entails digging an open trench along 25th Street. The open trench will be two to three feet wide and five or more feet deep, depending on the stability of the soil and on the presence of subsurface obstructions (SFERP 2005n:2-3). The ground disturbance of trenching for the gas pipeline has the potential to directly impact archaeological resources, unidentified at this time, to the extent of the area and depth of the trenches. Like the proposed plant site and laydown area, the land where the gas pipeline will be installed was created by filling Islais Creek Cove and had railroad tracks and other structures on it at one time, so there is at least a possibility that unknown archaeological resources could be encountered during construction, and procedures for identifying, evaluating, and possibly mitigating impacts to such resources must be put into place by means of conditions of certification.

As discussed above, it is possible that both prehistoric and historical archaeological deposits could be encountered during construction. If the newly found resources are eligible for the CRHR, the direct impacts from construction could materially impair the resources. Appropriate mitigation measures, such as avoidance or assessment and data recovery, must be implemented to reduce that impact to less than significant. In recognition of this possibility, CEQA allows a lead agency to make provisions for archaeological resources unexpectedly encountered during construction, and the project owner may be required to train workers to recognize cultural resources, fund mitigation and delay construction in the area of the find (Public Resources Code, section 21083.2; California Code of Regulations, Title 14, sections 15064.5(f) and 15126.4(b)). Staff's provisions for this eventuality are conditions of certification (see **Cul-5, Cul-6, Cul-7** and **Cul-8**, under Proposed Conditions of Certification, below), requiring that construction workers be trained, as part of the Worker Environmental Awareness Program, to recognize archaeological resources, that construction be monitored by a qualified archaeologist and halted if archaeological resources are encountered, that finds be evaluated for significance, and that data recovery be carried out if impacts cannot be avoided.

In the application, the applicant indicated that after the project was certified and construction could begin, a number of cultural resources mitigation measures will be put in place by the owner. The project owner will agree to have a qualified archaeologist monitor construction at the plant site and along the routes of the linear facilities. The project owner will expect that archaeological monitoring at the laydown area will be unnecessary because no subsurface disturbance is planned for that location. The owner

will allow the monitoring archaeologist to halt construction in the appropriate area if archaeological material is found, so that its significance may be determined in consultation with staff of the Energy Commission. For significant finds, the owner will expect mitigation measures to be developed in consultation with staff. The owner will also undertake a worker education program to train workers to recognize archaeological materials when they see them during construction and be informed about what to do when they find such materials (SFPUC 2005a:8.3-19). These measures suggested by the applicant correspond pretty closely to those staff proposes (see Proposed Conditions of Certification, below). Staff, however, must reserve judgment on whether or not the laydown area requires monitoring until the archaeological survey findings for the ungravelled parts of the laydown area are reported to the Energy Commission, projected for September 14, 2005 (Carrier 2005).

Direct Impacts on Historic Standing Structures

No previously recorded historic standing structures were identified in the construction zones of the project, so no standing historic structures will be demolished for this project. The proposed plant, however, with its tall combustion turbine stacks, will introduce a new element into the immediate area. In the abstract, such a change could affect the integrity of association, setting, and feeling of nearby standing historic structures and also affect the integrity of setting and feeling of the general area, including character-defining features of the potential Central Waterfront historic district. But, as reflected in the discussion which follows, staff does not believe that the plant will have a significant impact on historic structures.

The significant historic buildings located closest to the project construction zones are the two sugar warehouses at 435 23rd Street, which is 700 feet northeast of the proposed power plant. These warehouses were associated with the former Western Sugar Refinery and date to 1923 and 1929. The warehouses were part of a 16-building sugar-producing complex, the rest of which was demolished in 1951. Both warehouses are of steel frame construction erected on a reinforced concrete foundation. Reinforced concrete walls enclose the steel frames, and the industrial windows and ground level doors are steel. The architectural historians who evaluated the two warehouses found that they retain integrity of location, design, materials, and workmanship, since only minor changes have been made to the two structures. But, because the other structures and buildings that were part of the sugar refinery have been demolished, the evaluator found that there was some loss of integrity of setting and feeling (Mirant2001DRes4:#188; Mirant2001DRes4:#189). The architectural historians evaluated both buildings as eligible for listing, at the local level of significance, on both the NRHP, under Criterion A, and the CRHR, under Criterion 1 (SECAL 2001d:R3-8).

The applicant has stated that the proposed plant's impact to the integrity of setting and feeling of the two warehouses will not be of a degree to be considered significant. This is true, the applicant says, because the integrity of setting of the warehouses has already been reduced by the demolition of the rest of the sugar complex of which they were a part. The applicant also states that the evaluators who determined that the two warehouses were eligible for the NRHP and CRHR deemed the buildings significant for their integrity of location, design, workmanship, and association, not for their integrity of setting or feeling (SFERP 2005n:6).

Staff concurs that although the construction of the proposed power plant will affect the setting and feeling of the sugar warehouses, this impact will not be significant. These aspects of integrity are not important characteristics for the eligibility of the resources. Construction of the new power plant will not diminish the integrity of setting and feeling of the two sugar warehouses to the point that it would affect their eligibility for the CRHR or materially impair the resources. Consequently, this impact does not represent a significant effect on the environment.

The applicant also believes that the introduction of the proposed power plant in the Potrero area would have a negligible effect on the integrity of the potential Central Waterfront historic district because of its location at a distance from any of the buildings or structures identified as historic properties in the Central Waterfront study (SFPD 2001a), and because the industrial character of the proposed power plant is entirely in keeping with the character of the potential Central Waterfront historic district (SFERP 2005n:7)

Staff concurs with the applicant's determination that the introduction of the proposed power plant will not have a significant effect on the setting, feeling, or any character-defining features of the potential Central Waterfront historic district. Consequently, this impact does not represent a significant effect on the environment.

When asked whether the vibrations of construction could adversely affect historic structures adjacent to the underground transmission line trench, the applicant stated that the vibrations will only be equivalent to existing truck traffic and so will have no impact (SFERP 2005n:4). Staff accepts the applicant's conclusions regarding this potential impact due to lack of evidence showing otherwise and finds there will be no significant adverse physical impact on standing historic structures from the construction of the plant site or linear facilities.

No project-related construction impacts to standing historic structures which would materially impair their significance have been identified, so no mitigation is required for this class of cultural resources.

Direct Impacts on Ethnographic Resources

No ethnographic resources, either previously recorded or newly disclosed to date in the communications with Native Americans initiated by the applicant for the proposed project, were identified in the vicinity of the project. Consequently, no significant ethnographic resources were identified, and so no mitigation measures will be required for this class of cultural resources.

Indirect Impacts

Neither the applicant nor staff identified any indirect impacts to any identified cultural resources in the impact area of the proposed project, and so no mitigation measures will be required for any class of cultural resources.

Operation Impacts and Mitigation

In the course of the operation of the proposed power plant, if a leak should develop in the gas or water pipelines supplying the plant, repair of the buried utility could require

the excavation of a large hole. So such repairs could impact previously unknown subsurface archaeological resources in areas unaffected by the original trench excavation. The measures proposed for mitigating impacts to previously unknown archaeological resources during the construction of the plant and linear facilities (below) will also serve to mitigate impacts from repairs occurring during operation of the plant.

Cumulative Impacts and Mitigation

Cumulative impacts to historic architectural resources (structures or districts) in the project vicinity may occur if the construction of other projects results in increasing numbers of structures of historic age being demolished. However, the largest group of industrial historic buildings remaining in the area is the Pier 70 Historic District, adjacent to the proposed project on the north. The CCSF and Port of San Francisco are studying adaptive reuse of these structures as part of future development projects. Thus, these structures will likely be preserved as a result of future projects, rather than impacted. The other group of historic buildings in the area is the residential, commercial, and industrial buildings in the Dogpatch Neighborhood west of Third Street. No specific projects proposed for this area are known, although changes are likely.

The construction of other projects in the same vicinity as the proposed project could affect unknown subsurface archaeological deposits (both prehistoric and historic). In particular, the construction of San Francisco Municipal Railway's Metro East Light Rail Maintenance and Operations Facility on the 13 acres to the west of the power plant site has the potential to impact the same kinds of archaeological resources as may be affected by the construction of the proposed power plant because the land for both has the same history. Project proponents for the Light Rail project and for future projects in the Potrero area can mitigate impacts to as yet undiscovered subsurface archaeological deposits to less than significant by implementing mitigation measures requiring construction monitoring, evaluation of resources discovered during monitoring, and avoidance or data recovery for resources evaluated as significant (eligible for the CRHR or NRHP).

COMPLIANCE WITH APPLICABLE LORS

If the conditions of certification, below, are properly implemented, SFERP will result in a less than significant impact on newly found cultural resources or on those known resources which may be impacted in a previously unanticipated manner. The project will therefore be in compliance with CEQA and the other applicable state laws, ordinances, regulations, and standards listed in Table 1.

The City of San Francisco has only general language promoting historic preservation (primarily of historic structures) in its General Plan and its Central Waterfront Area Plan. The City, however, has no specific LORS which apply to other kinds of cultural resources, and no cultural resources LORS with which a development project must comply by taking specific actions. The conditions of certification (below) require specific actions not just to promote but to effect historic preservation and mitigate impacts to all cultural resources in order to ensure CEQA compliance. Consequently, if SFERP implements these conditions, its actions will be consistent with the general historic preservation goals of the City of San Francisco.

CONCLUSIONS

Staff's analysis demonstrates that SFERP will have no impact on significant historic standing structures, historic districts, or ethnographic resources. Impacts to archaeological resources will be discussed at a later time, when the applicant provides two reports on the archaeological survey of portions of the impact area, projected for September 14, 2005 (Carrier 2005). When the reports are received and the cultural resources inventory is complete, the analysis of SFERP's potential impacts to archaeological resources will be completed and mitigation measures proposed for all impacts that are significant.

RECOMMENDATION

Although mitigation measures for the proposed SFERP will be finalized when the two expected survey reports are received and their data incorporated into this assessment, preliminary mitigation measures can be recommended.

Staff recommends that the Commission adopt the following cultural resources conditions of certification (**CUL-1** to **CUL-8**, see below for list and details) which, as noted above, are consistent with the applicant's proposed mitigation measures, with the exception of monitoring the laydown area. When properly implemented, staff believes that these conditions of certification will mitigate any impacts to unknown cultural resources located in the areas discussed in this assessment.

These conditions are intended to facilitate the identification and assessment of previously unknown archaeological resources encountered during construction and to mitigate any significant impacts from the project on newly found resources assessed as significant. To accomplish this, the conditions provide for the archaeological monitoring of ground-disturbing construction activities, for the recovery of significant data from discovered archaeological deposits, for the writing of a technical report on monitoring activities and findings, and for the curation of recovered artifacts and other data. When staff receives the information needed to complete the cultural resources inventory and the identification of impacts (see Conclusions, above), additional conditions of certification may be required to mitigate newly identified impacts.

PROPOSED CONDITIONS OF CERTIFICATION

CUL-1 Prior to the start of ground disturbance (including grading), the project owner shall obtain the services of a Cultural Resources Specialist (CRS), and one or more alternates, if alternates are needed, to manage all monitoring, mitigation, and curation activities. The CRS may elect to obtain the services of Cultural Resource Monitors (CRMs) and other technical specialists, if needed, to assist in monitoring, mitigation, and curation activities. The project owner shall ensure that the CRS evaluates for eligibility to the California Register of Historic Resources (CRHR) any cultural resources that are newly discovered or that may be affected in an unanticipated manner. No ground disturbance (including grading and landscaping) shall occur prior to CPM

approval of the CRS, unless specifically approved by the CPM. Approval of a CRS may be denied or revoked for non-compliance on this or other projects.

CULTURAL RESOURCES SPECIALIST (CRS)

The resume for the CRS and alternate(s) shall include information demonstrating that the minimum qualifications specified in the U.S. Secretary of the Interior's Guidelines, including the minimum qualifications for a specialization in historical archaeology, as published at Title 36 of the Code of Federal Regulations, Part 61, are met. In addition, the CRS shall have the following qualifications:

1. The technical specialty of the CRS shall include a background in anthropology and historical archaeology; and
2. At least three years of archaeological resource mitigation and field experience in California.

The resume of the CRS shall include the names and telephone numbers of contacts familiar with the work of the CRS on referenced projects, and shall demonstrate that the CRS has the appropriate education and experience to accomplish the cultural resource tasks that must be addressed during ground disturbance, grading, construction, and operation. In lieu of the above requirements, the resume shall demonstrate to the satisfaction of the CPM that the proposed CRS or alternate has the appropriate training and background to effectively implement the conditions of certification.

CULTURAL RESOURCES MONITOR (CRM)

CRMs shall have the following qualifications:

1. a BS or BA degree in anthropology, archaeology, historical archaeology, or a related field, and one year experience monitoring in California; or
2. an AS or AA degree in anthropology, archaeology, historical archaeology, or a related field, and four years experience monitoring in California; or
3. enrollment in upper division classes pursuing a degree in the fields of anthropology, archaeology, historical archaeology, or a related field, and two years of monitoring experience in California.

CULTURAL RESOURCES TECHNICAL SPECIALISTS

The resume(s) of any additional technical specialists, e.g., prehistoric archaeologist, historian, architectural historian, and/or physical anthropologist, shall be submitted to the CPM for approval.

Verification: At least 45 days prior to the start of ground disturbance (including grading), the project owner shall submit the resume of the CRS and alternate(s), if desired, to the CPM for review and approval.

At least 10 days prior to a termination or release of the CRS, the project owner shall submit the resume of the proposed new CRS to the CPM for review and approval.

At least 20 days prior to ground disturbance (including grading), the CRS shall provide a letter naming anticipated CRMs for the project and stating that the identified CRMs meet the minimum qualifications for cultural resource monitoring required by this condition. If additional CRMs are obtained during the project, the CRS shall provide additional letters to the CPM identifying the CRMs and attesting to the qualifications of the CRM, at least five days prior to the CRM beginning on-site duties. At least 10 days prior to beginning specialized technical tasks, the resume(s) of any additional technical specialists shall be provided to the CPM for review and approval.

At least 10 days prior to the start of ground disturbance (including grading), the project owner shall confirm in writing to the CPM that the approved CRS will be available for on-site work and is prepared to implement the cultural resources conditions of certification.

CUL-2 Prior to the start of ground disturbance (including grading), if the CRS has not previously worked on the project, the project owner shall provide the CRS with copies of the AFC and the confidential cultural resources reports for the project. The project owner shall also provide the CRS and the CPM with maps and drawings showing the footprint of the power plant and all linear facilities. Maps shall include the appropriate USGS quadrangles and a map of the proposed plant site and linear facilities at an appropriate scale (e.g., 1:200 or 1" = 20') for plotting archaeological features. If the CRS requests enlargements for the plant site or strip maps for linear facility routes, the project owner shall provide copies to the CRS and CPM. The CPM shall review submittals and, in consultation with the CRS, approve those maps and drawings that are appropriate for use in cultural resources planning activities. No ground disturbance shall occur prior to CPM approval of maps and drawings, unless specifically approved by the CPM.

If construction of the project will proceed in phases, maps and drawings not previously provided shall be submitted prior to the start of each phase. Written notification identifying the proposed schedule of each project phase shall be provided to the CRS and CPM. The project owner shall notify the CRS and CPM of any changes to the scheduling of the construction phases.

At a minimum, the CRS shall consult weekly with the project construction manager to confirm area(s) to be worked during the next week, until ground disturbance is completed.

Verification: At least 40 days prior to the start of ground disturbance (including grading), the project owner shall submit the subject documents to the CRS and the subject maps and drawings to the CPM and CRS. The CPM will review the project owner's submittals in consultation with the CRS and approve maps and drawings suitable for cultural resources planning activities.

1. At least 15 days prior to the start of ground disturbance (including grading), if there are changes to any project-related footprint, the project owner shall provide to the CRS and CPM revised maps and drawings for those changes and an e-mail or letter from the CRS stating that cultural resources information, compiled during the siting phase of the project, has been received.

2. At least 15 days prior to each phase, if project construction is phased, the project owner shall provide to the CRS the subject maps and drawings, if not previously provided, and notify the CRS and CPM in writing, identifying the proposed schedule of each project phase.

3. On a weekly basis during ground disturbance, a current schedule of anticipated project activity shall be provided to the CRS and CPM by letter, email, or fax.

4. Within five (5) days of identifying any changes to the scheduling of construction phases, the project owner shall provide written notice to the CRS and CPM of the changes.

CUL- 3 Prior to the start of ground disturbance (including grading), the project owner shall submit the Cultural Resources Monitoring and Mitigation Plan (CRMMP), as prepared by (or its preparation overseen by) the CRS, to the CPM for approval. The CRMMP shall identify general and specific measures to minimize potential impacts to sensitive cultural resources. Implementation of the CRMMP shall be the responsibility of the CRS and the project owner. Copies of the CRMMP shall reside with the CRS, alternate CRS, each monitor, and the project owner's on-site manager. No ground disturbance shall occur prior to CPM approval of the CRMMP, unless specifically approved by the CPM.

The CRMMP shall include, but not be limited to, the following elements and measures:

1. A proposed research design that includes a discussion of archaeological research questions and testable hypotheses specifically applicable to the project area and a discussion of artifact collection and curation policies as functions of the research questions formulated in the research design. A programmatic treatment plan may be included in the CRMMP for limited resources types.

2. The following statement shall be added to the CRMMP's Introduction: "Any discussion, summary, or paraphrasing of the Conditions of Certification in this CRMMP is intended as general guidance and as an aid to the user in understanding the conditions and their implementation. If there appears to be any conflict between the Conditions and the way in which they have been summarized, described, or interpreted in the CRMMP, the Conditions, as written in the Final Decision, supercede any interpretation of the Conditions in the CRMMP." The Cultural Resources Conditions of Certification shall be attached as an appendix to the CRMMP.

3. Specification of the implementation sequence and the estimated time frames needed to accomplish all project-related archaeological tasks during ground disturbance, construction, and post-construction analysis phases of the project.

4. Identification of the person(s) expected to perform each of the archaeological tasks, their responsibilities; and the reporting relationships between project construction management and the mitigation and monitoring team.

5. A discussion of the inclusion of Native American observers or monitors, the procedures to be used to select them, and their role and responsibilities.

6. A discussion of all avoidance measures (such as flagging or fencing) which will be used to prohibit or otherwise restrict access to sensitive cultural resource areas that are to be avoided during construction and/or operation, and identification of areas where these measures are to be implemented. The discussion shall address how these measures would be implemented prior to the start of construction and how long they would be needed to protect the resources from project-related effects.

7. A discussion of the requirement that all cultural resources encountered that cannot be treated programmatically shall be recorded on a DPR form 523, mapped, and photographed. In addition, all archaeological materials collected as a result of the archaeological investigations (survey, testing, data recovery) shall be curated in accordance with the State Historical Resources Commission's "Guidelines for the Curation of Archaeological Collections," in a retrievable storage collection in a public repository or museum. The public repository or museum must meet the standards and requirements for the curation of cultural resources set forth at Title 36 of the Code of Federal Regulations, Part 79.

8. A discussion of any requirements, specifications, or funding needed for the curation of the materials to be delivered for curation and how requirements, specifications, and funding shall be met. If archaeological materials are to be curated, the name and phone number of the contact person at the institution shall be provided. This shall include information indicating that the project owner will pay all curation fees and state that any agreements concerning curation will be retained and be available for audit for the life of the project.

9. A discussion of the availability of and the designated specialist's access to equipment and supplies necessary for photographing and site mapping, and for recovering, recording, and photographing all cultural materials encountered during construction that cannot be treated programmatically.

10. A discussion of the proposed Cultural Resources Report (CRR, see **Cul-4**) which shall be prepared according to Archaeological Resource Management Report (ARMR) Guidelines.

Verification: At least 30 days prior to the start of ground disturbance (including grading), the project owner shall submit the subject CRMMP. Per ARMR Guidelines, the author's name shall appear on the title page of the CRMMP. Ground disturbance (including grading) activities may not commence until the CRMMP is approved, unless specifically approved by the CPM. A letter shall be provided to the CPM indicating that the project owner agrees to pay curation fees for any materials collected as a result of the archaeological investigations (survey, testing, data recovery).

CUL-4 The project owner shall submit the Cultural Resources Report (CRR) to the CPM for approval. The CRR shall be written by the CRS and shall be provided in the ARMR format. The CRR shall report on all field activities including dates, times and locations, findings, samplings, and analyses. All survey reports, Department of Parks and Recreation (DPR) 523 forms, and additional research reports not previously submitted to the California Historical Resources Information System (CHRIS) and the State Historic Preservation Officer (SHPO) shall be included as an appendix to the CRR. If the ARMR reports have previously been sent to the CHRIS, then receipt letters from the CHRIS shall be included in an appendix.

Verification: Within 90 days after completion of all ground disturbance (including grading and landscaping), the project owner shall submit the subject CRR. Within 10 days after CPM approval of the CRR, the project owner shall provide documentation to the CPM that copies of the CRR have been provided to the SHPO, the CHRIS, and the curating institution (if archaeological materials were collected and curated).

CUL-5 Prior to and for the duration of ground disturbance (including grading and landscaping), the project owner shall provide Worker Environmental Awareness Program (WEAP) training to all new workers within their first week of employment. The training shall be prepared by the CRS, may be conducted by any member of the archaeological team, and may be presented in the form of a video. The CRS shall be available (telephone or in person) to answer questions posed by employees. The project owner will require all trained workers to sign a WEAP Certification of Completion form. The training shall include:

1. A discussion of applicable laws and penalties under the law;

2. Samples or visuals of artifacts that might be found in the project area;

3. Instruction that the CRS, the alternate CRS, and the CRMs have the authority to halt construction to the degree necessary, as determined by the CRS, in the event of the discovery of or unanticipated impact to a cultural resource;

4. Instruction that employees are required to halt work on their own in the vicinity of a potential cultural resources discovery and to contact their

supervisor and the CRS or CRM, and that redirection of work shall be determined by the construction supervisor and the CRS;

5. An informational brochure that identifies reporting procedures in the event of a discovery;

6. A WEAP Certification of Completion form to be signed by each worker indicating that they have received the training; and

7. A sticker that shall be placed on hard hats indicating that environmental training has been completed.

No ground disturbance shall occur prior to implementation of the cultural resources portion of the WEAP program, unless specifically approved by the CPM.

Verification: At least 30 days prior to the beginning of site mobilization, the CRS shall provide the training program draft text and graphics and the informational brochure to the CPM for review and approval, and the CPM will provide to the project owner a WEAP Certification of Completion form which the project owner shall require each WEAP-trained worker to sign. The project owner shall provide in the Monthly Compliance Report the WEAP Certification of Completion forms of persons who have completed the training in the prior month and a running total of all persons who have completed training to date.

CUL-6 The project owner shall ensure that the CRS, alternate CRS, or CRMs shall monitor ground disturbance (including grading and landscaping) full-time in the vicinity of the project site and linears, and ground disturbance at laydown or other ancillary areas, to ensure there are no impacts to undiscovered cultural resources and to ensure that known cultural resources are not impacted in an unanticipated manner. In the event that the CRS determines that full-time monitoring is not necessary in certain locations, a letter or e-mail providing a detailed justification for the decision to reduce the level of monitoring shall be provided to the CPM for review and approval prior to any reduction in monitoring.

On forms provided by the CPM, CRMs shall keep a daily log of any monitoring, any other cultural resources activities, and any instances of non-compliance with the conditions of certification and/or applicable LORS. Copies of the daily logs shall be provided to the CPM by the CRS. In addition, the CRS shall use these logs to compile a monthly summary report on the progress or status of cultural resources-related activities. If there are no monitoring activities, the summary report shall specify why no monitoring is occurring. The CRS may informally discuss cultural resources monitoring and mitigation activities with Energy Commission technical staff.

Cultural resources monitoring activities are the responsibility of the CRS. Any interference with monitoring activities, removal of a monitor from duties assigned by the CRS, or direction to a monitor to relocate monitoring activities

by anyone other than the CRS shall be considered non-compliance with these conditions of certification.

The CRS and/or the project owner shall notify the CPM by telephone or e-mail within 24 hours of any incidents of non-compliance with the Cultural Resources conditions of certification and/or applicable LORS, upon becoming aware of the situation. The CRS shall also recommend corrective action to resolve the problem or achieve compliance with the conditions of certification. When the issue is resolved, the CRS shall write a report describing the issue, the resolution of the issue, and the effectiveness of the resolution measures. This report shall be provided in the next MCR.

Verification: At least 30 days prior to the start of ground disturbance, the CPM will provide to the CRS reproducible copies of forms to be used as daily monitoring logs. Each day the CRS shall provide copies of the legibly handwritten daily logs of the monitors to the CPM as emails or in some other form acceptable to the CPM. While monitoring is on-going, the project owner shall include in each MCR a copy of the monthly summary report of cultural resources-related monitoring prepared by the CRS. Copies of daily logs shall be retained by the project owner on-site during construction.

During the ground disturbance phases of the project, if the CRS wishes to reduce the level of monitoring occurring at the project, a letter or e-mail identifying the area(s) where the CRS recommends the reduction and justifying the reduction in monitoring shall be submitted to the CPM for review and approval. At least 24 hours prior to the date of planned reduction in monitoring, documentation justifying a reduced level of monitoring shall be submitted to the CPM.

CUL-7 A Native American monitor or monitors shall be obtained to monitor ground disturbance (including grading and landscaping) in areas where Native American artifacts may be discovered. Informational lists of concerned Native Americans and guidelines for monitoring shall be obtained from the Native American Heritage Commission. Preference in selecting a monitor or monitors shall be given to Native Americans with traditional ties to the area that shall be monitored.

Verification: At least one (1) week prior to ground disturbance in areas where there is a potential to discover Native American artifacts, the project owner shall send notification to the CPM identifying the person(s) retained to conduct Native American monitoring. The project owner shall also provide a plan identifying the proposed monitoring schedule and information explaining how Native Americans who wish to provide comments will be allowed to comment. If efforts to obtain the services of a qualified Native American monitor are unsuccessful, the project owner shall immediately inform the CPM. The CPM will either identify potential monitors or will allow ground disturbance to proceed without a Native American monitor.

CUL-8 The project owner shall grant authority to halt construction to the CRS, alternate CRS, and the CRMs in the event previously unknown cultural resources sites or materials are encountered (discovery), or if known resources may be impacted in a previously unanticipated manner. Redirection of ground disturbance (including grading and landscaping) shall be

accomplished under the direction of the construction supervisor in consultation with the CRS.

In the event cultural resources are found or impacts can be anticipated, construction shall be halted or redirected and shall remain halted or redirected until all of the following have occurred:

1. The CRS has notified the project owner, and the CPM has been notified within 24 hours of the discovery, or by the following Monday morning if the cultural resources discovery occurs between 8:00 AM on Friday and 8:00 AM on Sunday. Notification to the CPM must include a description of the discovery (or changes in character or attributes), the action taken (i.e., work stoppage or redirection), a recommendation of eligibility, and recommendations for mitigation of any cultural resources discoveries, whether or not a determination of significance has been made.

2. The CRS has completed field notes, measurements, and photography for a Department of Parks and Recreation (DPR) 523 primary form for all cultural materials that cannot be treated programmatically. The 523 primary form will include in the Description entry a recommendation of the significance of the find. The completed forms will be submitted to the CPM.

3. The CRS and the project owner have consulted with the CPM, and the CPM has concurred with the recommended eligibility of the discovery and proposed data recovery or other mitigation; and

4. Any necessary data recovery and mitigation has been completed.

Verification: At least 30 days prior to the start of ground disturbance, the project owner shall provide the CPM and CRS with a letter confirming that the CRS, alternate CRS, and CRMs have the authority to halt construction activities in the vicinity of a cultural resources discovery, and that the project owner shall ensure that the CRS notifies the CPM within 24 hours of a discovery, or by Monday morning if the cultural resources discovery occurs between 8:00 AM on Friday and 8:00 AM on Sunday. No later than 48 hours following the completion of data recordation/recovery for discovered cultural material that cannot be treated programmatically, completed DPR form 523s shall be submitted to the CPM for review and approval.

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HAZARDOUS MATERIALS MANAGEMENT

Alvin J. Greenberg, Ph.D. and Rick Tyler

SUMMARY OF CONCLUSIONS

Staff's evaluation of the proposed project (with staff's proposed mitigation measures) indicates that hazardous materials use would not present a significant impact to the public. With adoption of the proposed conditions of certification, the proposed project will comply with all applicable laws, ordinances, regulations and standards. In response to Health and Safety Code, section 25531 et seq., the applicant would be required to develop a Risk Management Plan. To insure adequacy of the Risk Management Plan, staff's proposed conditions of certification would require that the Risk Management Plan be submitted for concurrent review by United States Environmental Protection Agency, San Francisco Department of Public Health, and the California Energy Commission staff. In addition, staff's proposed conditions of certification require San Francisco Department of Public Health's review, and staff review and approval of the RMP prior to delivery of any hazardous materials to the facility. Other proposed conditions of certification address the issue of the transportation, storage, and use of aqueous ammonia.

INTRODUCTION

The purpose of this Hazardous Materials Management analysis is to determine if the proposed San Francisco Electric Reliability Project (SFERP) has the potential to cause significant impacts on the public as a result of the use, handling, storage, or transportation of hazardous materials at the proposed facility. If significant adverse impacts on the public are identified, Energy Commission staff must also evaluate the potential for facility design alternatives and additional mitigation measures to reduce impacts to the extent feasible.

This analysis does not address potential exposure of workers to hazardous materials used at the proposed facility. Employers must inform employees of hazards associated with their work and provide employees with special protective equipment and training to reduce the potential for health impacts associated with the handling of hazardous materials. The **Worker Safety and Fire Protection** section of this document describes the requirements applicable to the protection of workers from such risks.

Aqueous ammonia (29 percent ammonia in aqueous solution) is the only acutely hazardous material proposed to be used or stored at the SFERP in quantities exceeding the reportable amounts defined in the California Health and Safety Code, section 25532 (j) (SFPUC 2005a Table 8.12-4). Aqueous ammonia will be used for controlling oxides of nitrogen (NO_x) emissions through selective catalytic reduction. The use of aqueous ammonia significantly reduces the risk that would otherwise be associated with use of the more hazardous anhydrous form of ammonia. Use of the aqueous form eliminates the high internal energy associated with the anhydrous form which is stored as a liquefied gas at elevated pressure. The high internal energy associated with the anhydrous form of ammonia can act as a driving force in an accidental release, which can rapidly introduce large quantities of the material to the ambient air and result in high

down-wind concentrations. Spills associated with the aqueous form are much easier to contain than those associated with anhydrous ammonia and emissions from such spills are limited by the slow mass transfer from the surface of the spilled material.

Other hazardous materials, such as mineral and lubricating oils, corrosion inhibitors and water conditioners, will be present at the proposed facility. Hazardous materials used during the construction phase include gasoline, diesel fuel, motor oil, hydraulic fluid, welding gases, lubricants, solvents, paint, and paint thinner. No acutely toxic hazardous materials will be used onsite during construction. None of these materials pose significant potential for off-site impacts as a result of the quantities on-site, their relative toxicity, their physical state, and/or their environmental mobility. Although no natural gas is stored, the project will also involve the handling of large amounts of natural gas. Natural gas poses some risk of both fire and explosion. Natural gas will be delivered through a new 900-foot long, 12-inch-diameter gas pipeline connecting to an existing PG&E natural gas transmission line (San Francisco Line 101) at the intersection of Illinois and 25th streets (SFPUC 2005a Section 2.1). The SFERP project will also require the transportation of aqueous ammonia to the facility. This document addresses all potential impacts associated with the use and handling of hazardous materials.

LAWS, ORDINANCES, REGULATION, AND STANDARDS

The following federal, state, and local laws and policies apply to the protection of public health and hazardous materials management. Staff's analysis examines the project's compliance with these requirements.

HAZARDOUS MATERIALS MANAGEMENT Table 1
Laws, Ordinances, Regulations, and Standards

Applicable Law	Description
Federal	
The Superfund Amendments and Reauthorization Act of 1986 (42 USC §9601 et seq.)	Contains the Emergency Planning and Community Right To Know Act (also known as SARA Title III)
The Clean Air Act (CAA) of 1990 (42 USC 7401 et seq. as amended)	Established a nationwide emergency planning and response program and imposed reporting requirements for businesses which store, handle, or produce significant quantities of extremely hazardous materials.
The CAA section on Risk Management Plans (42 USC §112(r)	Requires the states to implement a comprehensive system to inform local agencies and the public when a significant quantity of such materials is stored or handled at a facility. The requirements of both SARA Title III and the CAA are reflected in the California Health and Safety Code, section 25531, et seq.
49 CFR 172.800	U.S. Department of Transportation (DOT) requirement that suppliers of hazardous materials prepare and implement security plans.

49 CFR Part 1572, Subparts A and B	Requires suppliers of hazardous materials to ensure that all their hazardous materials drivers are in compliance with personnel background security checks.
The Clean Water Act (CWA) (40 CFR 112)	Aims to prevent the discharge or threat of discharge of oil into navigable waters or adjoining shorelines. Requires a written Spill Prevention, Control, and Countermeasures (SPCC) plan to be prepared for facilities that store oil that my leak into navigable waters.
Title 49, Code of Federal Regulations, Part 190	Outlines gas pipeline safety program procedures.
Title 49, Code of Federal Regulations, Part 191	Addresses transportation of Natural and Other Gas by Pipeline: Annual Reports, Incident Reports, and Safety-Related Condition Reports, requires operators of pipeline systems to notify the U.S. Department of Transportation of any reportable incident by telephone and then submit a written report within 30 days.
Title 49, Code of Federal Regulations, Part 192	Addresses transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards, specifies minimum safety requirements for pipelines and includes material selection, design requirements, and corrosion protection. The safety requirements for pipeline construction vary according to the population density and land use, which characterize the surrounding land. This part also contains regulations governing pipeline construction, which must be, followed for Class 2 and Class 3 pipelines, and requirements for preparing a Pipeline Integrity Management Program.
State	
The California Health and Safety Code, section 25534	Directs facility owners, storing or handling acutely hazardous materials in reportable quantities, to develop a Risk Management Plan (RMP) and submit it to appropriate local authorities, the United States Environmental Protection Agency (EPA), and the designated local administering agency for review and approval. The plan must include an evaluation of the potential impacts associated with an accidental release, the likelihood of an accidental release occurring, the magnitude of potential human exposure, any preexisting evaluations or studies of the material, the likelihood of the substance being handled in the manner indicated, and the accident history of the material. This new, recently developed program supersedes the California Risk Management and Prevention Plan (RMPP).
Title 8, California Code of Regulations, Section 5189	Requires facility owners to develop and implement effective safety management plans to insure that large quantities of hazardous materials are handled safely. While such requirements primarily provide for the protection of workers, they also indirectly improve public safety and are coordinated with the RMP process.
Title 8, California Code of	Set forth requirements for design, construction and operation of vessels and equipment used to store and transfer ammonia. These

Regulations, Section 458 and Sections 500 to 515	sections generally codify the requirements of several industry codes, including the American Society for Material Engineering (ASME) Pressure Vessel Code, the American National Standards Institute (ANSI) K61.1 and the National Boiler and Pressure Vessel Inspection Code. These codes apply to anhydrous ammonia but are also used to design storage facilities for aqueous ammonia.
California Health and Safety Code, section 41700	Requires that "No person shall discharge from any source whatsoever such quantities of air contaminants or other material which causes injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause injury or damage to business or property."
California Safe Drinking Water and Toxic Enforcement Act (Proposition 65)	Prevents certain chemicals that cause cancer and reproductive toxicity to be discharged into sources of drinking water.
Local	
San Francisco Public Health Code	Includes requirements for handling of hazardous materials, and enforced by the San Francisco Department of Public Health (SFDPH). The City and County of San Francisco administers the hazardous materials handling and ensures compliance with federal and state laws.
Article 80 of the San Francisco Fire Code	Incorporates the hazardous materials handling requirements of the Uniform Fire Code (Articles 79 and 80, which include minimum setback requirements for outdoor storage of ammonia). The administering agency for this authority is the San Francisco Fire Department.
Article 22A of the San Francisco Public Health Code	Specifies the requirements for handling of regulated substances including the preparation of an RMS, and is enforced by the SFDPH.

The Certified Unified Program Authority (CUPA) with responsibility to review RMPs and Hazardous Materials Business Plans is the San Francisco Department of Public Health (SFDPH). In regards to seismic safety issues, the site is located in Seismic Risk Zone 4. Construction and design of buildings and vessels storing hazardous materials will meet the seismic requirements of CCR Title 24 and 2001 California Building Code (SFPUC 2005a Section 2.3.1).

SETTING

Several factors associated with the area in which a project is to be located affect the potential for an accidental release of a hazardous material to cause public health impacts. These include:

- local meteorology;

- terrain characteristics; and
- location of population centers and sensitive receptors relative to the project.

METEOROLOGICAL CONDITIONS

Meteorological conditions, including wind speed, wind direction and air temperature, affect the extent to which accidentally released hazardous materials would be dispersed into the air and the direction in which they would be transported. This affects the potential magnitude and extent of public exposure to such materials, as well as the associated health risks. When wind speeds are low and the atmosphere is stable, dispersion is severely reduced and can lead to increased localized public exposure.

Recorded wind speeds and ambient air temperatures are described in the Air Quality section (8.1) and Appendix 8.1 of the AFC (SFPUC 2005a). Staff agrees with the applicant that use of F stability (stagnated air, very little mixing), wind speed of 1.5 meters per second, and a temperature of 97 °F is appropriate for conducting the Offsite Consequence Analysis. Staff believes these represent a reasonably conservative scenario and thus reflects worst case atmospheric conditions.

TERRAIN CHARACTERISTICS

The location of elevated terrain is often an important factor to be considered in assessing potential exposure. An emission plume resulting from an accidental release may impact high elevations before impacting lower elevations. The site topography is mostly flat, with an average elevation of about 13.5 feet above mean sea level. Terrain in the project vicinity ranges up to 700 feet above see level and exists in all directions except for east, where the San Francisco bay shoreline begins about 500 feet from the site (SFERP 2004d USGS Quad Maps, SFPUC 2005a Section 2.3.1).

LOCATION OF EXPOSED POPULATIONS AND SENSITIVE RECEPTORS

The general population includes many sensitive subgroups that may be at greater risk from exposure to emitted pollutants. These sensitive subgroups include the very young, the elderly, and those with existing illnesses. In addition, the location of the population in the area surrounding a project site may have a large bearing on health risk. Table 8.12-2 of the AFC provides a list of sensitive receptors in the project vicinity, which are shown in Figures 8.6-1a and 8.6-1b (SFPUC 2005a). There are 233 schools and day care facilities, 15 hospitals, 32 senior care facilities, 221 churches, and 57 parks and recreation centers within a 3-mile radius of the site (SFPUC 2005a, Section 8.12.3). Table 8.4-2 of the Land Use section provides the distances to the nearest sensitive land uses (in a one mile radius) which include a church located 474 feet southwest of the project site.

The nearest sensitive receptor is a public park (Warm Water Cove Public Access area) located approximately 700 feet northeast of the project site, where some transients were found to be living at least temporarily in trailers and buses parked at the end of 24th street at the park. The nearest school (Starr King Elementary School) is located approximately 2,840 feet west of the site, and the nearest residence is located

approximately 1,600 feet west of the site (SFPUC 2005a Section 8.12.3 and Section 8.4.2.3).

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

Staff reviewed and assessed the potential for the transportation, handling, and use of hazardous materials to impact the surrounding community. All chemicals and natural gas were evaluated. Staff's analysis addresses potential impacts on all members of the population including the young, the elderly, and people with existing medical conditions that may make them more sensitive to the adverse effects of hazardous materials. In order to accomplish this goal, staff utilizes the most current acceptable public health exposure levels (both acute and chronic) set to protect the public from the effects of an accidental chemical release.

In order to assess the potential for released hazardous materials to travel off-site and affect the public, staff analyzed several aspects of the proposed use of these materials at the facility. Staff recognizes that some hazardous materials must be used at power plants. Therefore, staff conducted its analysis by examining the choice and amount of chemicals to be used, the manner in which the applicant will use the chemicals, the manner it will be transported to the facility and transferred to facility storage tanks, and the way the applicant plans to store the materials on-site.

Staff reviewed the applicant's proposed engineering controls and administrative controls concerning hazardous materials usage. Engineering controls are those physical or mechanical systems, such as storage tanks or automatic shut-off valves, that can prevent a spill of hazardous material from occurring or which can limit the spill to a small amount or confine it to a small area. Administrative controls are those rules and procedures that workers at the facility must follow that will help to prevent accidents or keep them small if they do occur. Both engineering and administrative controls can act as methods of prevention or as methods of response and minimization. In both cases, the goal is to prevent a spill from moving off-site and causing harm to the public.

Staff reviewed and evaluated the applicant's proposed use of hazardous materials as described by the applicant (SFPUC 2005a, Section 8.12). Staff's assessment followed the five steps listed below:

- Step 1: Staff reviewed the chemicals and the amounts proposed for on-site use as listed in Table 8.12-4 of the AFC and determined the need and appropriateness of their use.
- Step 2: Those chemicals, proposed for use in small amounts or whose physical state is such that there is virtually no chance that a spill would migrate off the site and impact the public, were removed from further assessment.
- Step 3: Measures proposed by the applicant to prevent spills were reviewed and evaluated. These included engineering controls such as automatic shut-off valves

and different size transfer-hose couplings and administrative controls such as worker training and safety management programs.

- Step 4: Measures proposed by the applicant to respond to accidents were reviewed and evaluated. These measures also included engineering controls such as catchment basins and methods to keep vapors from spreading and administrative controls such as training emergency response crews.
- Step 5: Staff analyzed the theoretical impacts on the public of a worst-case spill of hazardous materials even with the mitigation measures proposed by the applicant. When mitigation methods proposed by the applicant are sufficient, no further mitigation is recommended. If the proposed mitigation is not sufficient to reduce the potential for adverse impacts to an insignificant level, staff will propose additional prevention and response controls until the potential for causing harm to the public is reduced to an insignificant level. It is only at this point that staff can recommend that the facility be allowed to use hazardous materials.

DIRECT/INDIRECT IMPACTS AND MITIGATION

Small Quantity Hazardous Materials

In conducting the analysis, staff determined in Steps 1 and 2 that some materials, although present at the proposed facility, pose a minimal potential for off-site impacts as they will be stored in a solid form or in smaller quantities, have low mobility, or have low levels of toxicity. These hazardous materials, which were eliminated from further consideration, are discussed briefly below.

During the construction phase of the project, the only hazardous materials proposed for use include paint, paint thinner, cleaners, solvents, sealants, gasoline, diesel fuel, motor oil, hydraulic fluid, lubricants, and welding flux. Any impact of spills or other releases of these materials will be limited to the site due to the small quantities involved, the infrequent use and hence reduced chances of release, and/or the temporary containment berms used by contractors. Petroleum hydrocarbon-based motor fuels, mineral oil, lube oil, and diesel fuel are all of very low volatility and represent limited off-site hazard even in larger quantities.

During operations, acutely hazardous chemicals such as Aluminum Sulfate, Sodium Aluminate, Sodium Chloride, Ferric Chloride, and other various chemicals (see **Hazardous Materials Appendix C** for a list of all chemicals proposed to be used and stored at SFERP), would be used and stored in relatively small amounts and represent limited off-site hazard due to their small quantities, low volatility, and/or low toxicity.

Additionally, SFERP is proposing to use a wet cooling system using process water taken from the San Francisco combined sewer system and recycled to tertiary standards on-site. The process water will be delivered in a new 0.76-mile pipeline connecting the SFERP to a water pump station to be constructed on Marin Street near Cesar Chavez Street, and will be treated on-site at a new wastewater treatment plant constructed as part of the SFERP project. The on-site treatment will include primary, secondary, and tertiary treatment with additional disinfection by ultraviolet or chlorination (SFPUC 2005a Section 8.14.5.1.1). The circulating water in the cooling

system would be conditioned further to control pH, minimize corrosion, and control for the formation of mineral scale and biofouling. Chemicals added for these purposed may include acid or caustic, polyacrylate polymer, phosphate based corrosion inhibitor, and hypochlorite or other equivalent biocides (SFPUC 2005a Section 8.14.5.1.1). Any risks associated with chemical usage at this wastewater treatment pant would be adequately mitigated through compliance with the appropriate federal, state, and local requirements for hazardous materials use, and compliance with staff's proposed conditions of certification.

Sodium hypochlorite, sodium hydroxide, and sulfuric acid will be stored on-site but do not pose a risk of off-site impacts because the volumes stored will be less than 900 gallons, they have relatively low vapor pressures, and spills would be confined to the site. Because of concern at another proposed energy facility in 1995, staff conducted a quantitative assessment of the potential for impact associated with sulfuric acid use, storage, and transportation. Staff found no hazard would be posed to the public due to the extremely low volatility of this aqueous solution of sulfuric acid. However, in order to protect against risk of fire, staff proposes Condition of Certification **HAZ-5** which will require that no combustible or flammable material is stored within 50 feet of the sulfuric acid tank.

After removing from consideration those chemicals that pose no risk of off-site impact in Steps 1 and 2, staff continued with Steps 3, 4, and 5 to review the remaining hazardous materials: natural gas and aqueous ammonia.

Large Quantity Hazardous Materials

Natural Gas

Natural gas poses a fire and/or possible explosion risk as a result of its flammability. Natural gas is composed of mostly methane, but also contains ethane, propane, nitrogen, butane, isobutene, and isopentane. It is colorless, odorless, and tasteless and is lighter than air. Natural gas can cause asphyxiation when methane is ninety percent in concentration. Methane is flammable when mixed in air at concentrations of 5 to 14 percent, which is also the detonation range. Natural gas, therefore, poses a risk of fire and/or possible explosion if a release were to occur under certain specific conditions. However, it should be noted that, due to its tendency to disperse rapidly (Lees 1998), natural gas is less likely to cause explosions than many other fuel gases, such as propane or liquefied petroleum gas, but it can explode under certain conditions (as demonstrated by the recent natural gas detonation in Belgium in July of 2004).

While natural gas will be used in significant quantities, it will not be stored on-site. It will be delivered by way of a 900-foot pipeline that would be built as part of the project to connect it to an existing PG&E natural gas transmission line at Illinois and 25th Streets. The risk of a fire and/or explosion on-site can be reduced to insignificant levels through adherence to applicable codes and development and implementation of effective safety management practices. In particular, gas explosions can occur in the heat recovery steam generator (HRSG) and during start-up. The National Fire Protection Association (NFPA 85A) requires 1) the use of double block and bleed valves for gas shut-off; 2)

automated combustion controls; and 3) burner management systems. These measures will significantly reduce the likelihood of an explosion in gas-fired equipment. Additionally, start-up procedures would require air purging of the gas turbines prior to start-up, thus precluding the presence of an explosive mixture. The safety management plan proposed by the applicant would address the handling and use of natural gas and significantly reduce the potential for equipment failure due to improper maintenance or human error. The proposed facility will require the installation of a new 900-foot-long gas pipeline. About 100 feet of the pipeline will be installed between the SFERP metering station (on the west side of the site) and 25th Street (directly north), and the remaining 800 feet will run directly west along 25th street to the existing tie-in on Illinois Street (SFPUC 2005a Section 6.2 and Figure 2-1).

Since the proposed facility will require the installation of a new gas pipeline off-site, impacts from this pipeline need to be evaluated. The new gas pipeline proposed for this project would be constructed, owned and operated by PG&E (SFPUC 2005a Section 1.5). The design of the natural gas pipeline is governed by laws and regulations discussed here. These LORS require use of high quality arc welding techniques by certified welders and inspection of welds. Many failures of older natural gas lines have been associated with poor quality welds, or corrosion. Current codes address corrosion failures by requiring use of corrosion resistant coatings and cathodic corrosion protection. Another major cause of pipeline failure is damage resulting from excavation activities near pipelines. Current codes address this mode of failure by requiring clear marking of the pipeline route. An additional mode of failure particularly relevant to the project area is damage caused by earthquake. Existing codes also address seismic hazard in design criteria (see discussion below). Evaluation of pipeline performance in recent earthquakes indicates that pipelines designed to modern codes perform well in seismic events while older lines frequently fail. Staff believes that existing regulatory requirements are sufficient to reduce the risk of accidental release from the pipeline to insignificant levels.

Failures of gas pipelines, according to data from the U.S. Department of Transportation (the National Transportation Safety Board) from the period 1984 – 1991 and data from the National Response Center for the period 1990 - 2004, occur as a result of pipeline corrosion, pipeline construction or materials defects, rupture by heavy equipment excavating in the area such as bulldozers and backhoes, weather effects, and earthquakes. Given the gas line failures which occurred in the Marina District of San Francisco during the 1989 Loma Prieta earthquake, the January 1994 Northridge earthquake in Southern California, the January 1995 gas pipeline failures in Kobe, Japan, the January 19, 1995 gas explosion in San Francisco, the recent pipeline

explosion in Belgium in July 2004, and the natural gas storage fire in Texas in August 2004, the safety of the gas pipeline is of paramount importance. However, it must be noted that those pipelines which failed in 1989 and 1995 were older (at least 20 years old) and not manufactured nor installed to modern code requirements. The February 2001 Nisqually Earthquake near Olympia Washington caused no damage to natural gas mains and there was only one reported gas line leak due to a separation of a service line going into a mobile home park. The recent 2004 Belgium gas pipeline explosion was due to construction equipment rupturing the line, not due to earthquake or structural failure.

If loss of containment occurs as a result of pipe, valve, or other mechanical failure or external forces, significant quantities of compressed natural gas could be released rapidly. Such a release can result in a significant fire and/or explosion hazard, which could cause loss of life and/or significant property damage in the vicinity of the pipeline route. However, the probability of such an event is extremely low if the pipeline is constructed according to present standards.

According to DOT statistics, the frequency of reportable incidents is about 0.25 for all pipeline incidents per 1,000 miles per year or 2.5×10^{-4} incidents per mile per year. DOT has also evaluated and categorized the major causes of pipeline failure. To summarize, the four major causes of accidental releases from natural gas pipelines are: Outside Forces-43 percent, Corrosion-18 percent, Construction/Material Defects-13 percent, and Other-26 percent.

Outside forces are the primary causes of incidents. Damage from outside forces includes damage caused by use of heavy mechanical equipment near pipelines (e.g., bulldozers and backhoes used in excavation activities), weather effects, vandalism, and earthquake-caused rupture as seen in the Marina District of San Francisco during the 1989 Loma Prieta Quake and in Kobe, Japan in January 1995.

The fourth category, "Other" includes equipment component failure, compressor station failures, operator errors and sabotage. The average annual service incident frequency for natural gas transmission systems varies with age, the diameter of the pipeline, and the amount of corrosion.

Older pipelines have a significantly higher frequency of incidents. This results from the lack of corrosion protection and use of less corrosion resistant materials compared to modern pipelines, limited use of modern inspection techniques, and higher frequency of incidents involving outside forces. The increased incident rate due to outside forces is the result of the use of a larger number of smaller diameter pipelines in older systems, which are generally more easily damaged and the uncertainty regarding the locations of older pipelines.

The safety requirements for pipeline construction vary according to the population density and land use, which characterize the surrounding land. The pipeline classes are defined as follows (Title 49, Code of Federal Regulations, Part 192):

- Class 1: Pipelines in locations within 220 yards of ten or fewer buildings intended for human occupancy in any 1-mile segment.
- Class 2: Pipelines in locations within 220 yards of more than ten but fewer than 46 buildings intended for human occupancy in any 1-mile segment. This class also includes drainage ditches of public roads and railroad crossings.
- Class 3: Pipelines in locations within 220 yards of more than 46 buildings intended for human occupancy in any 1-mile segment, or where the pipeline is within 100 yards of any building or small well-defined outside area occupied by 20 or more people on at least 5 days a week for 10 weeks in any 12 month period (the days and weeks need not be consecutive).

- Class 4: Pipelines in locations within 220 yards of buildings with 4 or more stories above ground in any 1-mile segment.

In the United States, extensive federal and state pipeline codes and safety enforcement minimize the risk of severe accidents related to natural gas pipelines. In November 2000, the DOT Office of Pipeline Safety proposed a program requiring the preparation of risk management plans for gas pipelines throughout the United States. These risk management plans will include the use of diagnostic techniques to detect internal and external corrosion or cracks in pipelines and to perform preventive maintenance. The pipeline owner (PG&E) will be required to develop and implement these plans as per the regulation adopted May 2004 (49 CFR Part 192). The regulations prescribe minimum requirements for a pipeline Integrity Management Program to be prepared and followed by every operator of a pipeline segment located in a high consequence area. A high consequence area is defined as any location where the pipeline traverses a Class 3 or 4 area (see above) or other areas under specified circumstances. The integrity management program must contain the required elements as described in section 192.911 including an identification of all high consequence areas, a baseline assessment plan including methods of assessing pipeline integrity and a schedule for completing the assessment, an identification of threats to each pipeline segment including a risk assessment, an evaluation of mitigation measures, implementation procedures, and monitoring procedures. The regulations also include requirements for reassessment intervals, which range from 7 to 20 years depending on the type of reassessment and the operating percentage of the pipeline. As noted below, the SFERP gas pipeline will be installed in a Class 3 area.

The following safety features will be incorporated into the design and operation of the natural gas pipeline (as required by current federal and state codes): (1) while the pipeline will be designed, constructed, and tested to carry natural gas at a certain pressure, the working pressure will be less than the design pressure; (2) butt welds will be X-rayed and the pipeline will be tested with water prior to the introduction of natural gas into the line; (3) the pipeline will be surveyed for leakage annually (4) the pipeline will be marked to prevent rupture by heavy equipment excavating in the area; and (5) valves at the meter will be installed to isolate the line if a leak occurs.

The natural gas pipeline will be designed for Class 3 service and will meet California Public Utilities Commission General Order 112-E, 112-D, 58-A standards, and 49 CFR 192 standards for pipelines located in populated areas (SFPUC 2005a Sections 6.4 and 8.12.6). CPUC General Order 112-E, Section 125.1 requires that at least 30 days prior to the construction of a new pipeline, the owner must file a report with the commission that will include a route map for the pipeline. The natural gas pipeline must be constructed and operated in accordance with the Federal Department of Transportation (DOT) regulations, Title 49, Code of Federal Regulations (CFR), Parts 190, 191, and 192 (see Table 1 LORS).

Staff concludes that existing LORS are sufficient to ensure minimal risks of pipeline failure. Additionally, the gas pipeline constructed for this project will be only 900 feet long, which greatly reduces the risks of impacts to the public from a rupture or failure.

Aqueous Ammonia

Aqueous ammonia will be used in controlling the emission of oxides of nitrogen (NO_x) from the combustion of natural gas in the facility. The accidental release of aqueous ammonia without proper mitigation can result in significant down-wind concentrations of ammonia gas. One 12,000-gallon capacity above-ground storage tank will be used to store the 29 percent aqueous ammonia, with a maximum stored quantity of 10,000 gallons (SFPUC 2005a Section 8.12.4.2).

Based on staff's analysis, as described above, aqueous ammonia is the only hazardous material that may pose a risk of off-site impacts. The use of aqueous ammonia can result in the formation and release of toxic gases in the event of a spill even without interaction with other chemicals. This is a result of its moderate vapor pressure and the large amounts of aqueous ammonia that will be used and stored on-site. However, as with sodium hypochlorite solution, the use of aqueous ammonia instead of the much more hazardous anhydrous ammonia (i.e. ammonia that is not diluted with water) poses far less risk.

To assess the potential impacts associated with an accidental release of aqueous ammonia, staff uses the four "bench mark" exposure levels of ammonia gas occurring off-site. These include: 1) the lowest concentration posing a risk of lethality, 2,000 ppm; 2) the Immediately Dangerous to Life and Health (IDLH) level of 300 ppm; 3) the Emergency Response Planning Guideline (ERPG) level 2 of 150 ppm, which is also the RMP level 1 criterion used by EPA and California; and 4) the level considered by the Energy Commission staff to be without serious adverse effects on the public for a one-time exposure of 75 ppm (considered by staff to be a *deminimus* level). If the potential exposure associated with a potential release exceeds 75 ppm at any public receptor, staff will presume that the potential release poses a risk of significant impact. However, staff will also assess the probability of occurrence of the release and/or the nature of the potentially exposed population in determining whether, the likelihood and extent of potential exposure are sufficient to support a finding of potentially significant impact. A detailed discussion of the exposure criteria considered by staff and their applicability to different populations and exposure-specific conditions is provided in **Hazardous Materials Appendices A** and **B**.

Section 8.12.5 and Appendix 8.12A of the AFC (SFPUC 2005a) describe the modeling parameters used for the worst case accidental releases of aqueous ammonia in the applicant's Offsite Consequence Analysis (OCA). This modeling used the SLAB

numerical air dispersion model for a worst-case release associated with a failure of the storage tank into the containment area and subsequent flow into the planned subsurface vault. An alternative scenario of a spill from the delivery tanker truck during loading operation was not modeled. The worst-case storage tank spill assumed a release of 10,000 gallons (3,413 pounds) of 29 percent aqueous ammonia in 10 minutes, winds of 1.5 meters per second, ambient temperature of 97°F, and category F stability. The spilled ammonia was assumed to spill into a diked area of 665 square feet, which has a 24-inch diameter drain opening into a subsurface vault. To assure the conservative nature of this analysis, the surface area of the secondary containment

area (665 ft^2) and a release height of 0 meters above ground were used in the modeling, which assumes that the secondary containment drain is blocked. Ambient concentrations of ammonia were then calculated at 0, 1.6, 5, and 10 meters above ground level (SFPUC 2005a Appendix 8.12A).

The results indicated that concentrations exceeding 75 PPM in the worst-case scenario would extend about 31 meters (~102 feet) from the storage tank at a height of 1.6 meters above ground level, which is considered the breathing zone for humans. This distance extends west approximately 53 feet beyond the proposed facility fenceline into the proposed MUNI Operations and Maintenance Center site. This location is inaccessible to the public, and therefore no public access areas would be impacted as a result of an accidental release. The maximum concentration at the north, south, and east site boundaries would be lower than 75 PPM due to the ammonia storage tank location on the western side of the facility. The modeling results show concentrations exceeding 2000 ppm reaching up to 25.8 meters (84.6 feet) away from the ammonia storage tank, which would extend about 35 feet into the proposed MUNI site. The applicant has proposed additional mitigation measures to be implemented in collaboration with MUNI staff, such as ammonia censors that activate alarms and flashing lights to notify both SFERP and MUNI employees of an ammonia spill. (SFPUC 2005a Appendix 8.12A).

The applicant also modeled the worst case aqueous ammonia release scenario using the RMP*Comp program as recommended by the SFDPH. The results of this modeling show ammonia concentrations of 200 ppm extending 161 meters (528 feet) from the tank (SFPUC 2005a Appendix 8.12A). However, the RMP*Comp model is considered a planning tool that makes general estimates and therefore the SLAB modeling presents a more plausible scenario for the worst case accidental release of ammonia.

Staff reviewed the applicant's aqueous ammonia modeling calculations and conducted independent modeling of two accidental release scenarios: a release from the proposed SFERP storage tank and a release from a delivery truck during unloading. Staff used two models for these analyses, SCREEN 3 and the new California Air Resources Board Hotspots Analysis and Reporting Program (HARP) model. Both models produced similar and consistent results (see **Hazardous Materials Appendix D** for staff's modeling input, output, and figures). For the storage tank release scenario, the HARP model predicted an ammonia concentration of 95 ppm at the facility western fenceline (the nearest fenceline to the ammonia tank, approximately 46 feet away), and 0.2 ppm at the nearest residence (approximately 1,759 feet west of the western property

boundary), and the SCREEN 3 model predicted a concentration of 94 ppm at the eastern fenceline, and 1.0 ppm at the nearest residence. HARP calculated the maximum concentration of ammonia to be 271 ppm at a location 20 feet from the ammonia tank, and SCREEN 3 predicted a maximum concentration of 127 ppm to occur at a location 30 feet from the tank.

For the truck unloading scenario, the HARP model predicted an ammonia concentration of 0.000014 ppm at the western fenceline, 0.00000023 ppm at the nearest residence, and a maximum concentration of 0.000038 ppm at a location 30 feet from the ammonia

unloading area. The SCREEN 3 model could not be used to model this scenario because of limitations in this model.

According to these modeling results, the Energy Commission's *deminimus* level (75 ppm) would not be reached at any off-site location. Since the lowest odor threshold for ammonia is about 5 ppm, it is doubtful that any odor would be noticed by any residential or sensitive receptor should an accidental release occur. Therefore staff concurs with the applicant's modeling and conclusions and finds that due to the engineering controls proposed by the applicant and those required by staff for the storage and transfer of aqueous ammonia, any accidental release of aqueous ammonia at the project site will not cause a significant impact. Therefore staff concludes that the use, storage, and handling of aqueous ammonia proposed for this project will not represent a significant risk to the public.

Urea SCR

Urea, $(NH_2)_2CO$, can be used as an alternative source of ammonia for selective catalytic reduction of NOx emissions at power plants. Urea, in contrast to gaseous anhydrous ammonia or the liquid aqueous ammonia, is a solid compound that does not require any special handling or storage precautions (Walker 2003). It is not flammable or reactive, has low acute and chronic toxicity, and does not pose the inhalation health hazards associated with the anhydrous or aqueous forms of ammonia. Urea is available in a dry form (pellets) that readily dissolve in water. Urea in dry form is approximately 46 percent nitrogen, more than aqueous ammonia solutions but less than anhydrous ammonia (Wojichowski 2002).

Urea undergoes hydrolysis to produce ammonia gas, carbon dioxide gas, and water vapor. Systems such as Ammonia On Demand (AOD^{TM}) and Urea to Ammonia (U2A^{TM}) are designed to hydrolyze urea at variable rates and inject the ammonia into the SCR reactor. Urea SCR systems can produce ammonia on-site at various rates from less than 30 lb/hr up to 10,000 lb/hr (Gialanella 2001). Systems have been installed successfully at various power plants including Canal Station Unit 1 in Sandwich, Massachusetts, Clifty Creek power plant, Kyger Creek power plant, Alamitos generating facility, and Huntington Beach California Station Units 1 & 2. Reports on NOx removal range from 70-90 percent reduction at typical exhaust temperatures of 300-425 °C (JM, product advertisement, undated) up to 93-94 percent NOx removal (Walker 2003). High efficiency of hydrolysis and high reliability have been reported (Walker 2000). Urea SCR systems use a "feedforward" system for determining the urea injection rate based on power plant operating parameters and exhaust temperatures (EPA 2000). Spent urea is recycled back into the mix tanks and all gas products (CO_2 and H_2O) are collected through vents and directed into the boiler flue gas duct ahead of the SCR, so the process has a low environmental impact (Walker 2000). The newest urea SCR systems provide 100 percent availability and "push start" button startups. Standard sizes have been developed in the ranges 125 to 4,000 lbs ammonia per hour. Operating systems are fully automatic and govern multiple hydrolyser and SCR systems (Walker 2003).

In comparison to aqueous and anhydrous ammonia, hydrolysis systems using urea have slightly higher capital costs but significantly lower operating costs. The increased

initial investment in urea systems over aqueous or anhydrous ammonia can be paid back within a year because of the lower operating, maintenance, and compliance costs (Walker 2000). Cost effectiveness actually goes up for many SCR systems as the size of the boiler increases (EPA 1994).

The first commercial scale U2A™ system was started up in October 2000 at AES Alamitos Station and provided ammonia to an existing SCR system. Alamitos Unit 6 is a 480 MW, gas-fired B&W boiler, and the U2A™ for Alamitos was designed to produce 340 lb/hr ammonia.

Potential drawbacks of using urea SCR:

- Has only been used for approximately 4 years, not very long history of use and experience.
- May not be approved by local agencies for use at power plants because short history of tested performance.
- Relies on deliveries of large quantities of urea pellets.
- Requires continuous monitoring of ammonia levels to match concentration on NOx in exhaust (all ammonia SCR systems).
- High ammonia concentrations may cause a release of unreacted ammonia to the environment as increased ammonia slip (all ammonia SCR systems).
- Limited number of suppliers may make cost of transport high.
- May require specific storage conditions on-site that will minimize contact with moisture (dry urea is hygroscopic), or specific storage conditions for urea solution.
- Questions exist about the application of this technology to gas turbines because of the lack of adequate response time in providing ammonia on-demand.

Advantages of using urea SCR:

- Environmentally safe, no inhalation health hazard, no special handling requirements.
- Easy and safe transport, storage, and use.
- Not regulated.
- Low permitting costs.

According to EPA Region 9 Air Division, urea SCR will no doubt work for large power plants. However, Region 9 officials believe that urea may be less chemically efficient and more expensive to purchase, a direct contradiction to the opinion of vendors (EPA 2004). An expert from the Department of Energy's National Energy Technology Laboratory (NETL) supports EPA's view and found that the chemical inefficiency of urea may result from an incomplete hydrolysis process where not all of the urea is converted to ammonia. According to the NETL, urea SCR was designed for safety purposes, rather than for economic advantages, and the penalty of using it includes higher costs associated with running the hydrolysis unit which consumes energy. NETL is not aware of any documented problems with urea SCR technology, but also notes that it is a relatively new technology (DOE NETL 2004).

After evaluation, staff finds that although the use of a solid form of ammonia would indeed reduce or eliminate any risk of the storage and transport of aqueous ammonia, those risks are already *deminimus*, that is, are insignificant. Staff also finds that the on-site generation of any chemical, in this case ammonia gas, presents some risk of inefficient production or loss of ability to generate adequate amounts of ammonia on-demand, however short-term. Staff therefore concludes that in the absence of a finding of a significant impact that must be mitigated, the applicant is free to choose the method of supply of ammonia it desires and which it determines to be the most efficacious and cost-effective.

SCONOx

The SCONOx system is another alternative to the use of ammonia to control NOx emission from exhaust. This technology uses one catalyst for the reduction of both NOx and CO, with zero ammonia slip (Czarnecki 2000). Industry claims that SCONOx can provide ammonia-free NOx emission reduction to levels below 2 ppm, and be successfully used in applications in the 5 to 500 MW range (EmeraChem 2002). SCONOx works by simultaneously oxidizing CO to CO_2 and NO to NO_2, and absorbing NO_2 on the surface of the catalyst by using a reaction with the potassium carbonate coating of the catalyst. This reaction produces potassium nitrites and nitrates that build up on the surface of the catalyst and cause the need to regenerate it periodically to maintain maximum NOx absorption rates.

SCONOx technology has been mostly used on small scale units, but a scaled-up system for use in 100 MW units and greater has been designed.

Some of the facilities that use SCONOx include:

- 32 MW turbine at the Federal Cogeneration facility in LA, installed 1996
- 25 MW facility at UCSD, installed 2001
- 25 MW City of Vernon power plant
- an industrial facility in Massachusetts (unknown MWs)
- 43 MW CTG at Redding Power Plant

Although SCONOx technology has not been used at larger scale facilities (500 MW), there is conjecture in the literature by EPA and the South Coast Air Quality Management District (SCAQMD) that the SCONOx technology can be scaled up to a larger facility and still achieve the same NOx emission reduction. This has not yet been proven and EPA staff has indicated that using SCONOx on larger scale facilities may work but not be cost effective (EPA 2003).

SCONOx has been proposed for a couple of large-scale plants, such as Otay Mesa (500 MW), where the applicant (Calpine) eventually determined SCR would work best for that site, and Nueva Azalea (552 MW), where SCAQMD had issued a temporary permit accepting the SCONOx proposal, but the project was dropped due to public opposition to the entire project (SCAQMD 2003a and 2003b).

Some of the drawbacks of SCONOx are:

- it has not been tested in larger facilities and therefore claims of application and efficiency remain unproven
- it is more costly than SCR to install and operate
- the companies that sell it are smaller than SCR companies, with less money to take care of major problems if they occur at larger facilities
- it has a very sensitive catalyst that is regenerated using hydrogen
- NOx emissions gradually rise over time requiring a 1 to 2-day shutdown every 6-12 months (depending on fuel quality and operation) to remove and regenerate the absorption modules off-site.

The SFERP applicant's Data Response AQ-7 (SFERP 2004q) stated that SCONOx would not work for the SFERP project because of recent experience at the Redding Power Plant (which uses SCONOx on its 43 MW CTG) demonstrating that the catalyst must be removed and washed at least twice a year to maintain control efficiency. This cleaning process requires a shutdown of the unit; thus, SCONOx would not be acceptable for a power plant like SFERP that needs to maintain reliability. Staff had evaluated the use of SCONOx prior to receipt of the applicant's Data Responses and had independently found that the SCONOx equipment requires one to two-day shutdowns for cleaning every 6-12 months in order to maintain maximum levels of NOx control. Therefore, staff finds that the use of SCONOx technology for this project is not viable.

Mitigation

The potential for accidents resulting in the release of hazardous materials is greatly reduced by the implementation of a safety management program, which includes the use of both engineering and administrative controls. Elements of facility controls and the safety management plan are summarized below.

Engineering Controls

Engineering controls help to prevent accidents and releases (spills) from moving off-site and impacting the community by incorporating engineering safety design criteria into the design of the facility. The engineered safety features proposed by the applicant for use at this facility include:

- construction of secondary containment areas surrounding each of the hazardous materials storage areas designed to contain accidental releases that might happen during storage or delivery;
- physical separation of stored chemicals in isolated containment areas separated by a noncombustible partition in order to prevent accidental mixing of incompatible materials which may result in the evolution and release of toxic gases or fumes;
- installation of an automatic sprinkler systems and an exhaust system for indoor hazardous materials storage areas;

- construction of a concrete secondary containment area surrounding the aqueous ammonia storage tank with a sloped floor that will drain any liquid through a 24-inch opening to a covered sump;
- construction of a bermed containment area surrounding the truck unloading area with a sloped floor draining into the spill vault under the storage tank through a 4-inch drain;
- process protective systems including continuous tank level monitors, temperature and pressure monitors, alarms, check valves, and emergency block valves; and
- ammonia censors in the vicinity of the ammonia storage tank that would activate alarms and flashing lights to alert SFERP and MUNI employees that a spill has occurred.

Administrative Controls

Administrative controls also help prevent accidents and releases (spills) from moving off-site and impacting the community by establishing worker training programs, process safety management programs and by complying with all applicable health and safety laws, ordinances and standards.

A worker health and safety program will be prepared by the applicant and will include (but is not limited to) the following elements (see **WORKER SAFETY/FIRE PROTECTION** section in this PSA for specific regulatory requirements):

- worker training regarding chemical hazards, health and safety issues, and hazard communication;
- procedures to ensure the proper use of personal protective equipment;
- safety operating procedures for operation and maintenance of systems utilizing hazardous materials;
- fire safety and prevention; and
- emergency response actions including facility evacuation, hazardous material spill cleanup, and fire prevention.

At the facility, the project owner will be required to designate an individual who has the responsibility and authority to ensure a safe and healthful workplace. The project health and safety official will oversee the health and safety program and will have the authority to halt any action or modify any work practice in order to protect the workers, facility, and the surrounding community in the event that the health and safety program is violated.

The applicant will also prepare a Risk Management Plan (RMP) for aqueous ammonia as required by CalARP regulations and Condition of Certification **HAZ-2** that would include a program for prevention of accidental releases and responding to an accidental release of aqueous ammonia. A Hazardous Materials Business Plan (HMBP) will also be prepared by the applicant that would incorporate state requirements for the handling of hazardous materials (SFPUC 2005a Section 8.12.8.2.1).

On-site Spill Response

In order to address the issue of spill response, the facility will prepare and implement an Emergency Response Plan which includes information on hazardous materials contingency and emergency response procedures, spill containment and prevention systems, personnel training, spill notification, on-site spill containment, prevention equipment and capabilities, etc. Emergency procedures will be established which include evacuation, spill cleanup, hazard prevention, and emergency response.

The San Francisco Hazardous Materials Team stationed at SFFD fire station No. 36 is located at 109 Oak Street approximately 4 miles from the project site and considered first responder for HazMat incidents. The SFFD has 61 trained hazmat specialist, 25 of them work at station No. 36. Backup support services and technical consulting will be provided by Rescue squads 1 and 2, the Bureau of Fire Prevention hazmat inspectors, industrial hygienists, environmental health inspectors from the San Francisco Department of Public Health, and the Coast Guard. Response time for hazmat incidents will be about 30 minutes (SFPUC 2005a Section 8.8.3.6.3).

Additionally, designated plant personnel will be assigned to a hazmat response team and receive first responder training, hazmat technical training, and training in mitigation and control measures (SFPUC 2005a Section 8.12.8.2.1).

Staff concludes that the hazardous materials response time is acceptable and that the SFFD HazMat Response Team is adequately trained and equipped to respond in a timely manner (CCSF 2004).

Transportation of Hazardous Materials

Hazardous materials, including aqueous ammonia, sulfuric acid, and cleaning chemicals, will be transported to the facility via tanker truck. While many types of hazardous materials will be transported to the site, staff believes that transport of aqueous ammonia poses the predominant risk associated with hazardous materials transport.

Staff reviewed the applicant's proposed transportation routes for hazardous materials delivery. The applicant stated that the exact route will be determined by the CHP before delivery of ammonia (SFPUC 2005a, Section 8.10.3.9). However, staff has analyzed the optional routes and has concluded that the best choice for the transportation of hazardous materials will be from I-280 to Cesar Chavez Street, to Illinois Street, to 25th Street, to the project site.

Ammonia can be released during a transportation accident and the extent of impact in the event of such a release would depend on the location of the accident and on the rate of dispersion of ammonia vapor from the surface of the aqueous ammonia pool. The likelihood of an accidental release during transport is dependent on three factors:

- the skill of the tanker truck driver,
- the type of vehicle used for transport, and
- accident rates.

To address this concern, staff evaluated the risk of an accidental transportation release in the project area. Staff's analysis focused on the project area after the delivery vehicle leaves the main highway (I-280). Staff believes that it is appropriate to rely on the extensive regulatory program that applies to shipment of hazardous materials on California Highways to ensure safe handling in general transportation (see The Federal Hazardous Materials Transportation Law 49 USC §5101 et seq, The US Department of Transportation Regulations 49 CFR Subpart H, §172-700, and California DMV Regulations on Hazardous Cargo). These regulations also address the issue of driver competence. See AFC section 8.10 for additional information on regulations governing the transportation of hazardous materials.

To address the issue of tank truck safety, aqueous ammonia will be delivered to the proposed facility in Department of Transportation (DOT) certified vehicles with design capacity of 6,500 gallons. These vehicles will be designed to DOT Code MC-307. These are high integrity vehicles designed for hauling of caustic materials such as ammonia. Staff has, therefore, proposed Condition of Certification **HAZ-6** to ensure that regardless of which vendor supplies the aqueous ammonia, delivery will be made in a tanker, which meets or exceeds the specifications described by these regulations.

To address the issue of accident rates, staff reviewed the technical and scientific literature on hazardous materials transportation (including tanker trucks) accident rates in the United States and California. Staff relied on six references and three federal government databases to assess the risks of a hazardous materials transportation accident.

Staff used the data from the Davies and Lees (1992) article which references the 1990 Harwood et al. study, to determine that the frequency of release for transportation of hazardous materials in the U.S. is between 0.06 and 0.19 releases per million miles traveled on well designed roads and highways. The maximum usage of aqueous ammonia each year of operation of the proposed SFERP will require about 14 tanker truck deliveries of aqueous ammonia per year each delivering about 6,500 gallons. Each delivery will travel approximately 0.7 miles from I-280 to the facility along Cesar Chavez Street, to Illinois Street, to 25th Street, to the facility.

This would result in about 10 miles of delivery tanker truck travel in the project area per year (with a full load). Staff finds that the risk over this distance is insignificant. Data from the U.S. DOT show that the actual risk of a fatality over the past five years from all modes of hazardous material transportation (rail, air, boat, and truck) is approximately 0.1 in one million.

In addition, staff used a Transportation Risk Assessment model developed by staff in order to calculate the risk of an upset associated with aqueous ammonia delivery from the freeway to the facility. Results show a risk of 0.25 in one million for one trip and a risk of 1.72 in a million per year for 14 deliveries. This risk was calculated using accident rates on various types of roads (urban, one lane and two-lane) with distances traveled on each type of road computed separately. Although it is an extremely conservative model, the results show the risk of a transportation accident to be insignificant.

Staff therefore believes the risk of exposure to significant concentrations of aqueous ammonia during transportation to the facility are insignificant because of the remote possibility of accidental release of a sufficient quantity to present a danger to the public. The transportation of similar volumes of hazardous materials on the nation's highways is not unique nor an infrequent occurrence. Staff's analysis of the transportation of aqueous ammonia to the proposed facility (along with data from the U.S. DOT) demonstrates that the risk of accident and exposure is less than significant.

Based on the environmental mobility, toxicity, quantities present at the site and frequency of delivery, it is staff's opinion that aqueous ammonia poses the predominate risk associated with hazardous materials transportation and use at the proposed facility. Staff concludes that the risk associated with transportation of other hazardous materials to the proposed facility does not significantly increase the risk of impact beyond that associated with ammonia transportation.

Seismic Issues

The possibility exists that an earthquake would cause the failure of a hazardous materials storage tank. The quake could also cause the failure of the secondary containment system (berms and dikes) as well as electrically controlled valves and pumps. The failure of all these preventive control measures might then result in a vapor cloud of hazardous materials moving off-site and impacting the residents and workers in the surrounding community. The effects of the Loma Prieta earthquake of 1989, the Northridge earthquake of 1994, and the earthquake in Kobe, Japan, in January 1995, heighten the concern regarding earthquake safety.

Information obtained after the January 1994 Northridge earthquake showed that some damage was caused to several large storage tanks and smaller tanks associated with the water treatment system of a cogeneration facility. Those tanks with the greatest damage, including seam leakage, were older tanks, while the newer tanks sustained displacements and failures of attached lines. Therefore, staff conducted an analysis of the codes and standards, which should be followed in adequately designing and building storage tanks and containment areas to withstand a large earthquake. Staff also reviewed the impacts of the February 2001 Nisqually earthquake near Olympia, Washington, a state with similar seismic design codes as California. No hazardous materials storage tanks were impacted by this quake. Referring to the sections on **Geologic Resources and Hazards** and **Facility Design** in the AFC, staff notes that the proposed facility will be designed and constructed to the applicable standards of the 2001 California Building Code and the 1997 Uniform Building Code for Seismic Zone 4 (SFPUC 2005a Section 2.3.1). Therefore, on the basis of what occurred in Northridge with older tanks and the lack of failures during the Nisqually earthquake with newer tanks, staff determined that tank failures during seismic events are not probable and do not represent a significant risk to the public.

Site Security

This facility proposes to use hazardous materials that have been identified by the US EPA as materials where special site security measures should be developed and implemented to ensure that unauthorized access is prevented. The EPA published a Chemical Accident Prevention Alert regarding Site Security (EPA 2000a), the US

Department of Justice published a special report on Chemical Facility Vulnerability Assessment Methodology (US DOJ 2002), the North American Electric Reliability Council published Security Guidelines for the Electricity Sector in 2002 (NAERC 2002), and the U.S. Department of Energy published a draft Vulnerability Assessment methodology for Electric Power Infrastructure in 2002 (DOE 2002). The energy generation sector is one of the 13 areas of Critical Infrastructure listed by the U.S. Department of Homeland Security.

The applicant has stated that a security plan will be prepared for the proposed facility, and will include a description of perimeter security measures, and procedures for evacuating, notifying authorities of a security breach, conducting site personnel background checks, and site access. Perimeter security measures utilized for this facility may include security guards, security alarms, breach detectors, motion detectors, and video or cameral systems (SFPUC 2005a Section 8.12.8.2.5). In order to ensure that this facility or a shipment of hazardous material is not the target of unauthorized access, staff's proposed Conditions of Certification **HAZ-8** and **HAZ-9** address both a Construction Security Plan and an Operations Security Plan. These plans would require the implementation of Site Security measures consistent with the above-referenced documents and CEC guidelines.

The goal of these conditions of certification is to provide for the minimum level of security for power plants to protect California's electrical infrastructure from malicious mischief, vandalism, or domestic/foreign terrorist attacks. The level of security needed for this power plant is dependent upon the threat imposed, the likelihood of an adversary attack, the likelihood of adversary success in causing a catastrophic event, and the severity of consequences of that event. The results of the off-site consequence analysis prepared as part of the Risk Management Plan (RMP) will be used, in part, to determine the severity of consequences of a catastrophic event. In order to determine the level of security, the CEC staff will provide guidance in the form of a vulnerability assessment (VA) decision matrix modeled after the U.S. Department of Justice Chemical Vulnerability Assessment Methodology (July 2002) and the U.S. Department of Energy VAM-CF model. Basic site security measures shall be required at all locations in order to protect the infrastructure and electrical power generation within the state.

These measures will include perimeter fencing and detectors, possibly guards, alarms, site access procedures for employees and vendors, site personnel background checks, and law enforcement contact in the event of security breach. Site access for vendors shall be strictly controlled. Consistent with current state and federal regulations governing the transport of hazardous materials, hazardous materials vendors will have to maintain their transport vehicle fleet and employ only drivers properly licensed and trained. The project owner will be required, through the use of contractual language with vendors, to ensure that vendors supplying hazardous materials strictly adhere to the U.S. Department of Transportation (DOT) requirements for Hazardous Materials vendors to prepare and implement security plans as per 49 CFR 172.800 and to ensure that all hazardous materials drivers are in compliance with personnel background security checks as per 49 CFR Part 1572, Subparts A and B.

The CPM may authorize modifications to these measures, or may require additional measures depending on circumstances unique to the facility, and in response to site operator and/or industry-related security concerns.

CUMULATIVE IMPACTS AND MITIGATION

Staff reviewed the potential for the operation of the SFERP combined with existing facilities to result in cumulative impacts on the population within the area. Facilities in the project vicinity that have filed a Risk Management Plan and may contribute to a cumulative impact are listed in Table 8.12-9 of the AFC (SFPUC 2005a Page 8.12-31). In addition, staff reviewed inventory data received from the San Francisco Department of Public Health Hazardous Materials Division (SFDPH) on all facilities in the project area (defined as approximately one-mile from SFERP) that have any hazardous materials used or stored on site. All facilities were reviewed and those that pose a risk of contributing to cumulative impacts were analyzed in greater detail. Those facilities store or use chemicals that may pose a risk of migrating offsite in the event of a release due to their quantity, mobility, physical state, and/or toxicity. Staff paid particular attention to facilities that store large amounts of compressed gas and to facilities that store significant quantities of materials such as sulfuric acid and ammonia (see **Hazardous Materials Appendix E** for a list of the most significant facilities with hazardous materials in the project vicinity).

Staff found that the facility with the most potential to cause a cumulative impact is the Potrero Power Plant that uses aqueous ammonia for NO_x reduction and has installed an ammonia SCR system and storage tank. The Potrero Power Plant will store up to 20,000 gallons of 29.4 percent aqueous ammonia in one above-ground storage tank located approximately 0.35 miles (~1875 feet) from the proposed SFERP aqueous ammonia storage tank. None of the other facilities reviewed in the project vicinity represent a real risk of causing a cumulative impact due to their location, the quantities stored on-site, and the low toxicity and/or low mobility of the materials present. The OCA conducted by Mirant as part of their RMP used EPA's RMP*Comp program, which provides a very general and conservative estimate of impacts. This modeling calculated that ammonia concentrations of 200 ppm would extend approximately 0.9 miles from the Potrero Power Plant site (SFPUC 2005a Section 8.12.7), a distance which staff disputes and finds unusable for emergency planning purposes. In 2004, staff contacted Mirant and received a draft Offsite Consequence Analysis (OCA) conducted for the Potrero Power Plant as part of the draft RMP filed by Mirant (Mirant 2004a). Staff used Mirant's draft OCA to conduct an independent analysis and model the release of aqueous ammonia from the Potrero PP and the proposed SFERP simultaneously using the HARP model. Staff used a wind speed of 1.5 m/sec, stability class F, and ambient temperature of 112°F, which represent the worst-case scenario (see **Hazardous Materials Appendix F** for staff's modeling input, output, and figures). Staff found that airborne impacts from an accidental release of aqueous ammonia at the transfer pad or storage tank area would be confined to the Potrero site.

Staff's modeling results show that in the unlikely event of a simultaneous release from both the proposed SFERP ammonia storage tank and the existing Potrero Power Plant ammonia storage tank, the plumes would not combine to produce airborne concentrations above that predicted to occur from a release from a single tank. Staff's

modeling predicted that the maximum ammonia concentration would occur due to only one tank's emissions and not due to a co-mingling of releases from both tanks. Based on these results, CEC's *deminimus* level (75 ppm) would not be reached at any off-site location and it is doubtful that an odor would even be noticed by most people (odor threshold is ~5 ppm for the most sensitive people). Therefore, no significant cumulative impacts are likely to occur from the use of aqueous ammonia at the SFERP and the Potrero Power Plant.

In order to assess the cumulative impacts associated with the transportation of aqueous ammonia, staff used the Transportation Risk Assessment model developed by staff to calculate the risk from aqueous ammonia deliveries to both the SFERP and the Potrero Power Plant. Mirant staff provided an estimate of truck deliveries per year (28 deliveries) which were added to the risk calculation for the SFERP ammonia deliveries. The results show a risk of 5.15 in a million per year for travel from the freeway to the facilities. Staff finds that the risk of exposure to significant concentrations of aqueous ammonia during transportation to both facilities is insignificant because of the remote possibility of accidental release of a sufficient quantity to present a danger to the public. Staff's conclusion is based upon its own assessment of transportation of aqueous ammonia to both facilities and on data from the U.S. DOT.

The applicant will develop and implement a hazardous materials handling program for the SFERP project independent of any other projects considered for potential cumulative impacts. Staff finds that the facility, as proposed by the applicant and with the additional mitigation measures proposed by staff, poses a minimal risk of accidental release that could result in offsite impacts. It is unlikely that an accidental release that has very low probability of occurrence (about one in one million per year) would independently occur at the SFERP site and another facility at the same time. Therefore, staff concludes that the facility would not contribute to a significant cumulative impact.

COMPLIANCE WITH LORS

Staff concludes that construction and operation of the SFERP would be in compliance with all applicable LORS regarding long-term and short-term project impacts in the area of Hazardous Materials Management.

CONCLUSIONS

Staff's evaluation of the proposed project (with proposed mitigation measures) indicates that hazardous materials use will pose no significant impacts on the public. Staff's analysis also shows that there will be no significant cumulative impact. With adoption of the proposed Conditions of Certification, the proposed project will comply with all applicable LORS. In response to Health and Safety Code, section 25531 et seq., the applicant will be required to develop an RMP. To insure adequacy of the RMP, staff's proposed Conditions of Certification require that the RMP be submitted for concurrent review by US EPA, San Francisco Department of Public Health, and Energy Commission staff. In addition, staff's proposed Conditions of Certification require San Francisco Department of Public Health's review, and staff review and approval of the

RMP prior to delivery of any hazardous materials to the facility. Other proposed Conditions of Certification address the issue of the transportation, storage, and use of aqueous ammonia and the use of anhydrous ammonia as a refrigerant.

Staff recommends the Energy Commission impose the proposed Conditions of Certification, presented herein, to ensure that the project is designed, constructed and operated to comply with applicable LORS and to protect the public from significant risk of exposure to an accidental ammonia release. If all mitigation proposed by the applicant and by staff are required, the use, storage, and transportation of hazardous materials will not present a significant risk to the public.

Staff proposes seven Conditions of Certification mentioned throughout the text (above) and listed below. **HAZ-1** ensures that no hazardous material would be used at the facility except those listed in the AFC unless there is prior approval by the City and County and the Energy Commission Compliance Project Manager (CPM). **HAZ-2** requires that a RMP be prepared and submitted prior to the delivery of aqueous ammonia.

Staff believes that an accidental release of aqueous ammonia during transfer from the delivery tanker to the storage tank is the most probable accident scenario, and therefore proposes a condition (**HAZ-3**) requiring development of a safety management plan for the delivery of aqueous ammonia. The development of a Safety Management Plan addressing delivery of ammonia will further reduce the risk of any accidental release not addressed by the proposed spill prevention mitigation measures and the required RMP. **HAZ-4** requires that the aqueous ammonia storage tank be designed to certain rigid specifications, **HAZ-5** addresses the storage of sulfuric acid, and the transportation of hazardous materials is addressed in **HAZ-6, & 7**. Site security during both the construction and operations phases is addressed in **HAZ-8** and **HAZ-9**.

PROPOSED CONDITIONS OF CERTIFICATION

HAZ-1 The project owner shall not use any hazardous materials not listed in Appendix C, below, or in greater quantities than those identified by chemical name in Appendix C, below, unless approved in advance by the CPM.

Verification: The project owner shall provide to the Compliance Project Manager (CPM), in the Annual Compliance Report, a list of hazardous materials contained at the facility.

HAZ-2 The project owner shall concurrently provide a Business Plan and a RMP to the Certified Unified Program Authority – (CUPA) (San Francisco Department of Public Health) and the CPM for review at the time the RMP is first submitted to the U.S. Environmental Protection Agency (EPA). After receiving comments from the CUPA, the EPA, and the CPM, the project owner shall reflect all recommendations in the final documents. Copies of the final Business Plan and RMP shall then be provided to the CUPA and EPA for information and to the CPM for approval.

Verification: At least 60 days prior to receiving any hazardous material on the site for commissioning or operations, the project owner shall provide a copy of a final Business Plan to the CPM for approval. At least sixty (60) days prior to delivery of aqueous ammonia to the site, the project owner shall provide the final RMP to the CUPA for information and to the CPM for approval.

HAZ-3 The project owner shall develop and implement a Safety Management Plan for delivery of aqueous ammonia. The plan shall include procedures, protective equipment requirements, training and a checklist. It shall also include a section describing all measures to be implemented to prevent mixing of aqueous ammonia with incompatible hazardous materials.

Verification: At least sixty (60) days prior to the delivery of aqueous ammonia to the facility, the project owner shall provide a safety management plan as described above to the CPM for review and approval.

HAZ-4 The aqueous ammonia storage facility shall be designed to either the ASME Pressure Vessel Code and ANSI K61.6 or to API 620. In either case, the storage tank shall be protected by a secondary containment basin capable of holding 125 percent of the storage volume or the storage volume plus the volume associated with 24 hours of rain assuming the 25-year storm. The final design drawings and specifications for the ammonia storage tank and secondary containment basins shall be submitted to the CPM.

Verification: At least sixty (60) days prior to delivery of aqueous ammonia to the facility, the project owner shall submit final design drawings and specifications for the ammonia storage tank and secondary containment basin to the CPM for review and approval.

HAZ-5 The project owner shall ensure that no flammable material is stored within 50 feet of the sulfuric acid tank.

Verification: At least sixty (60) days prior to receipt of sulfuric acid on-site, the project owner shall provide copies of the facility design drawings showing the location of the sulfuric acid storage tank and the location of any tanks, drums, or piping containing any flammable materials.

HAZ-6 The project owner shall direct all vendors delivering aqueous ammonia to the site to use only tanker truck transport vehicles which meet or exceed the specifications of DOT Code MC-307.

Verification: At least sixty (60) days prior to receipt of aqueous ammonia on site, the project owner shall submit copies of the notification letter to supply vendors indicating the transport vehicle specifications to the CPM for review and approval.

HAZ-7 The project owner shall direct all vendors delivering any hazardous material to the site to use only the route approved by the CPM (Interstate-280, to Cesar Chavez Street off-ramp, to Third Street, to Illinois St. to 25th Street, to the project site). The project owner shall obtain approval of the CPM if an alternate route is desired.

Verification: At least sixty (60) days prior to receipt of any hazardous materials on site, the project owner shall submit copies of the required transportation route limitation direction to the CPM for review and approval.

HAZ-8 At least 30 days prior to commencing construction, a site-specific Construction Site Security Plan for the construction phase shall be prepared and made available to the CPM for review and approval. The Construction Security Plan shall include the following:

1. Perimeter security consisting of fencing enclosing the construction area;
2. Security guards;
3. Site access control consisting of a check-in procedure or tag system for construction personnel and visitors;
4. Written standard procedures for employees, contractors and vendors when encountering suspicious objects or packages on-site or off-site;
5. Protocol for contacting law enforcement and the CPM in the event of suspicious activity or emergency; and
6. Evacuation procedures.

Verification: At least thirty (30) days to commencing construction, the project owner shall notify the CPM that a site-specific Construction Security Plan is available for review and approval.

HAZ-9 In order to determine the level of security appropriate for this power plant, the project owner shall prepare a Vulnerability Assessment and submit that assessment as part of the Operations Security Plan to the CPM for review and approval. The Vulnerability Assessment shall be prepared according to guidelines issued by the North American Electrical Reliability Council (NERC 2002), the U.S. Department of Energy (DOE 2002), and the U.S. Department of Justice Chemical Vulnerability Assessment Methodology (July 2002). Physical site security shall be consistent with the guidelines issued by the NERC (Version 1.0, June 14, 2002) and the DOE (2002) and will also be based, in part, on the use and storage of certain quantities of acutely hazardous materials as described by the California Accidental Release Prevention Program (Cal-ARP, Health and Safety Code section 25531).

The project owner shall also prepare a site-specific Security Plan for the operational phase and shall be made available to the CPM for review and approval. The project owner shall implement site security measures addressing physical site security and hazardous materials storage. The level of security to be implemented will be determined by the results of the Vulnerability Assessment but in no case shall the level of security be less than that described as below (as per NERC 2002).

The Operation Security Plan shall include the following:

1. Permanent full perimeter fence or wall, at least 8 feet high;
2. Main entrance security gate, either hand operable or motorized;

3. Evacuation procedures;
4. Protocol for contacting law enforcement and the CPM in the event of suspicious activity or emergency;
5. Written standard procedures for employees, contractors and vendors when encountering suspicious objects or packages on-site or off-site;
6. Site personnel background checks, including employee and routine on-site contractors [Site personnel background checks are limited to ascertaining that the employee's claims of identity and employment history are accurate. All site personnel background checks shall be consistent with state and federal law regarding security and privacy.];
7. Site access controls for employees, contractors, vendors, and visitors;
8. Requirements for Hazardous Materials vendors to prepare and implement security plans as per 49 CFR 172.800 and to ensure that all hazardous materials drivers are in compliance with personnel background security checks as per 49 CFR Part 1572, Subparts A and B;
9. Closed Circuit TV (CCTV) monitoring system, recordable, and viewable in the power plant control room and security station (if separate from the control room) capable of viewing, at a minimum, the main entrance gate and the ammonia storage tank; and
10. Additional measures to ensure adequate perimeter security consisting of either:

    A. Security guards present 24 hours per day, 7 days per week.
    or

    B. Power plant personnel on-site 24 hours per day, 7 days per week and **all** of the following:

    1. The CCTV monitoring system required in number 9 above shall include cameras that are able to pan, tilt, and zoom (PTZ), have low-light capability, are recordable, and are able to view 100 percent of the perimeter fence, the ammonia storage tank, the outside entrance to the control room, and the front gate from a monitor in the power plant control room; **and**
    2. Perimeter breach detectors **or** on-site motion detectors.

The Project Owner shall fully implement the security plans and obtain CPM approval of any substantive modifications to the security plans. The CPM may authorize modifications to these measures, or may require additional measures, such as protective barriers for critical power pant components (e.g., transformers, gas lines, compressors, etc.) depending on circumstances unique to the facility or in response to industry-related standards, security concerns, or additional guidance provided by the U.S. Department of Homeland Security, the U.S. Department of Energy, or the North American Electrical Reliability Council.

Verification: At least 30 days prior to the initial receipt of hazardous materials on-site, the project owner shall notify the CPM that a site-specific Vulnerability Assessment and Operations Site Security Plan are available for review and approval.

REFERENCES

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Hazardous Materials
Appendix A

Basis for Staff's Use of 75 PPM Ammonia Exposure Criteria

September 2004

BASIS FOR STAFF'S USE OF 75 PPM AMMONIA EXPOSURE CRITERIA

Staff uses a health-based airborne concentration of 75 PPM to evaluate the significance of impacts associated with potential accidental releases of ammonia. While this level is not consistent with the 200-ppm level used by EPA and Cal/EPA in evaluating such releases pursuant to the Federal Risk Management Program and State Accidental Release Program, it is appropriate for use in staff's analysis of the proposed project. The Federal Risk Management Program and the State Accidental Release Program are administrative programs designed to address emergency planning and ensure that appropriate safety management practices and actions are implemented in response to accidental releases. However, the regulations implementing these programs do not provide clear authority to require design changes or other major changes to a proposed facility. The preface to the Emergency Response Planning Guidelines (ERPGs) states that "these values have been derived as planning and emergency response guidelines, **not** exposure guidelines, they do not contain the safety factors normally incorporated into exposure guidelines. Instead they are estimates, by the committee, of the thresholds above which there would be an unacceptable likelihood of observing the defined effects." It is staff's contention that these values apply to healthy adult individuals and are levels that should not be used to evaluate the acceptability of avoidable exposures for the entire population. While these guidelines are useful in decision making in the event that a release has already occurred (for example, prioritizing evacuations), they are not appropriate for and are not binding on discretionary decisions involving proposed facilities where many options for mitigation are feasible. CEQA requires permitting agencies making discretionary decisions to identify and mitigate potentially significant impacts through feasible changes or alternatives to the proposed project.

Staff has chosen to use the National Research Council's 30-minute Short Term Public Emergency Limit (STPEL) for ammonia to determine the potential for significant impact. This limit is designed to apply to accidental unanticipated releases and subsequent public exposure. Exposure at this level should not result in serious effects but would result in "strong odor, lacrimation, and irritation of the upper respiratory tract (nose and throat), but no incapacitation or prevention of self-rescue." It is staff's opinion that exposures to concentrations above these levels pose significant risk of adverse health impacts on sensitive members of the general public. It is also staff's position that these exposure limits are the best available criteria to use in gauging the significance of public exposures associated with potential accidental releases. It is, further, staff's opinion that these limits constitute an appropriate balance between public protection and mitigation of unlikely events, and are useful in focusing mitigation efforts on those release scenarios that pose real potential for serious impacts on the public. Table 1 provides a comparison of the intended use and limitations associated with each of the various criteria that staff considered in arriving at the decision to use the 75-ppm STPEL. **Hazardous Materials Appendix B** provides a summary of adverse effects, which might be expected to occur at various airborne concentrations of ammonia.

Hazardous Materials Appendix A Table-1
Acute Ammonia Exposure Guidelines

Guideline	Responsible Authority	Applicable Exposed Group	Allowable Exposure Level	Allowable* Duration of Exposures	Potential Toxicity at Guideline Level/Intended Purpose of Guideline
IDLH[2]	NIOSH	Workplace standard used to identify appropriate respiratory protection.	300 ppm	30 min.	Exposure above this level requires the use of "highly reliable" respiratory protection and poses the risk of death, serious irreversible injury or impairment of the ability to escape.
IDLH/10[1]	EPA, NIOSH	Work place standard adjusted for general population factor of 10 for variation in sensitivity	30 ppm	30 min.	Protects nearly all segments of general population from irreversible effects
STEL[2]	NIOSH	Adult healthy male workers	35 ppm	15 min. 4 times per 8 hr day	No toxicity, including avoidance of irritation
EEGL[3]	NRC	Adult healthy workers, military personnel	100 ppm	Generally less than 60 min.	Significant irritation but no impact on personnel in performance of emergency work; no irreversible health effects in healthy adults. Emergency conditions one time exposure
STPEL[4]	NRC	Most members of general population	50 ppm 75 ppm 100 ppm	60 min. 30 min. 10 min.	Significant irritation but protects nearly all segments of general population from irreversible acute or late effects. One time accidental exposure
TWA[2]	NIOSH	Adult healthy male workers	25 ppm	8 hr.	No toxicity or irritation on continuous exposure for repeated 8 hr. Work shifts
ERPG-2[5]	AIHA	Applicable only to emergency response planning for the general population (evacuation) (not intended as exposure criteria) (see preface attached)	200 ppm	60 min.	Exposures above this level entail** unacceptable risk of irreversible effects in healthy adult members of the general population (no safety margin)

1) (EPA 1987) 2) (NIOSH 1994) 3) (NRC 1985) 4) (NRC 1972) 5) (AIHA 1989)

* The (NRC 1979), (WHO 1986), and (Henderson and Haggard 1943) all conclude that available data confirm the direct relationship to increases in effect with both increased exposure and increased exposure duration.

** The (NRC 1979) describes a study involving young animals, which suggests greater sensitivity to acute exposure in young animals. The (WHO 1986) warns that the young, elderly, asthmatics, those with bronchitis and those that exercise should also be considered at increased risk based on their demonstrated greater susceptibility to other non-specific irritants.

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Abbreviations for Hazardous Materials Appendix A, Table 1

ACGIH, American Conference of Governmental and Industrial Hygienists
AIHA, American Industrial Hygienists Association
EEGL, Emergency Exposure Guidance Level
EPA, Environmental Protection Agency
ERPG, Emergency Response Planning Guidelines
IDLH, Immediately Dangerous to Life and Health Level
NIOSH, National Institute of Occupational Safety and Health
NRC, National Research Council
STEL, Short Term Exposure Limit
STPEL, Short Term Public Emergency Limit
TLV, Threshold Limit Value
WHO, World Health Organization

Hazardous Materials
Appendix B

Summary of Adverse Health Effects of Ammonia

September 2004

SUMMARY OF ADVERSE HEALTH EFFECTS OF AMMONIA[1]

638 PPM

WITHIN SECONDS:

- Significant adverse health effects;
- Might interfere with capability to self rescue;
- Reversible effects such as severe eye, nose and throat irritation.

AFTER 30 MINUTES:

- Persistent nose and throat irritation even after exposure stopped;
- irreversible or long-lasting effects possible: lung injury;
- Sensitive people such as the elderly, infants, and those with breathing problems (asthma) experience difficulty in breathing;
- Asthmatics will experience a worsening of their condition and a decrease in breathing ability, which might impair their ability to move out of area.

266 PPM

WITHIN SECONDS:

- Adverse health effects;
- Very strong odor of ammonia;
- Reversible moderate eye, nose and throat irritation.

AFTER 30 MINUTES:

- Some decrease in breathing ability but doubtful that any effect would persist after exposure stopped;
- Sensitive persons: experience difficulty in breathing;
- Asthmatics: may have a worsening condition and decreased breathing ability, which might impair their ability to move out of the area.

64 PPM

WITHIN SECONDS:

- Most people would notice a strong odor;
- Tearing of the eyes would occur;
- Odor would be very noticeable and uncomfortable.
- Sensitive people could experience more irritation but it would be unlikely that breathing would be impaired to the point of interfering with capability of self rescue

[1] Source: Alvin Greenberg, Ph.D., QEP

- Mild eye, nose, or throat irritation
- Eye, ear, & throat irritation in sensitive people
- Asthmatics might have breathing difficulties but would not impair capability of self rescue

22 or 27 PPM

WITHIN SECONDS:

- Most people would notice an odor;
- No tearing of the eyes would occur;
- Odor might be uncomfortable for some;
- Sensitive people may experience some irritation but ability to leave area would not be impaired;
- Slight irritation after 10 minutes in some people.

4.0, 2.2, or 1.6 PPM

- No adverse effects would be expected to occur;
- Doubtful that anyone would notice any ammonia (odor threshold 5 - 20 PPM);
- Some people might experience irritation after 1 hr.

Hazardous Materials
Appendix C

Hazardous Materials Proposed for Use at the SFERP

June 2005

Hazardous Materials Appendix C Table 1:
Hazardous Materials Proposed for Use at the SFERP[a]

Material	CAS No.	Application	Location	Hazardous Characteristics	Maximum Quantity On Site	CERCLA SARA RQ[b]
Aluminum Sulfate	10043-01-3	Coagulant for plant makeup water	Water treatment building	Health: moderately toxic by ingestion Physical: none	800 gallons	5,000 lb
Aqueous Ammonia 29 % solution	1336-21-6	NO_X Emissions Control	East and adjacent to treated water storage tank	Health: irritation to permanent damage from inhalation, ingestion, and skin contact Physical: reactive, vapor is combustible	10,000 gallons	100 lb
Citric Acid 50 %	77-92-9	pH control of upstream of reverse osmosis equipment	Wastewater treatment building	Health: skin and mucous membrane irritant and seer eye irritant Physical: reactive with strong bases and oxidizers	100 gallons	-
Cleaning chemicals/ Detergents	None	Periodic cleaning	Shop or warehouse area	Health: various Physical: various	20 gallons	100 gallons
Hypersperse MS 1310	7705-08-0	Prevent scale in reverse osmosis membranes	Water treatment building	Health: may cause irritation to skin and eyes Physical: None	200 gallons	-
Ferric Chloride	77-92-9	Coagulant for plant makeup water	Water treatment building	Health: burns eyes and skin, ingestion may cause stomach pain, nausea, vomiting, shock, and diarrhea Physical: heat sensitive	400 gallons	1,000 lb
Ferric Sulfate	10028-22-5	Coagulant for plant makeup water	Water treatment building	Health: irritates mucous membranes, respiratory tract, and lung tissue if inhaled; burns skin and eyes; ingestion can cause stomach irritation, burns, liver cirrhosis and fibrosis of pancreas Physical: reactive	400 gallons	1,000 lb

Laboratory Reagents (liquid)	None	Water/wastewater laboratory analysis	Water treatment building	Health: various Physical: various	20 gallons	-
Laboratory Reagents (solid)	None	Water/wastewater laboratory analysis	Water treatment building	Health: various Physical: various	100 lb	-
Mineral Generator Lubrication Oil	None	Lubricate rotating equipment	Contained within storage tanks on equipment skids	Health: hazardous if ingested Physical: may be flammable/combustible	1,570 gallons	42 gallons
Mineral Transformer Insulating Oil	8012-95-1	Transformers/switchyard	Contained within transformers and electrical switches	Health: hazardous if ingested Physical: may be flammable/combustible	21,000 gallons	42 gallons
NALCOLYTE 8799 (Coagulant Aid Polymer)	7647-14-5 205077000 00-5062P	Coagulant for plant makeup water	Water treatment building	Health: prolonged contact may cause irritation to skin and eyes Physical: reactive with strong oxidizers	400 gallons	-
NALCO 8305 Plus (Corrosion Inhibitor)	None	Cooling tower cooling water corrosion inhibitor	Near chiller cooling tower	Health: irritant to eyes, skin, and respiratory tract Physical: reactive	200 gallons	-
NALCO TRASAR 23263 (Dispersant)	64665-57-2	Cooling tower cooling water dispersant	Near chiller cooling tower	Health: none Physical: none	200 gallons	-
Polyacrylate (Various Scale Inhibitors)	Various	Cooling tower scale inhibitor	Near chiller cooling towers	Health: sight to moderate toxicity; irritant to skin and eyes Physical: reactive with strong acids	400 gallons	-
Sodium Aluminate	1302-42-7	Coagulant for plant makeup water	Water treatment building	Health: strong irritant to tissue Physical: reactive with strong acids and oxidizers	400 gallons	-
Sodium Bisulfite (NALCO 7804)	7631-90-5	Remove free chlorine in reclaimed water upstream of reverse osmosis system and wastewater treatment	Water treatment building and wastewater treatment building	Health: irritation to eyes, skin, and lungs; may be harmful if ingested Physical: reactive with strong acids and oxidizers	450 gallons	5,000 lb
Sodium Bromide	1310-73-2	Cooling tower	Near chiller cooling	Health: irritation to skin, eyes,	200 gallons	1,000 lb

(NALCO STABREX st40)		biocide and process water pretreatment	towers and water treatment building	respiratory tract; can cause damage to central nervous system if ingested Physical: reactive		
Sodium Hydroxide (50 %)	1310-73-2	pH control upstream of reverse osmosis equipment and wastewater treatment	Water treatment building and wastewater treatment building	Health: irritant to tissue in presence of moisture; strong irritant if ingested Physical: reactive	425 gallons	1,000 lb
Sodium Hypochlorite (10.13-12 %)	7681-52-9	Biocide to treat inlet reclaimed water/cooling tower biocide and process water pretreatment/and wastewater treatment	Water treatment building/ near chiller cooling tower/ Wastewater treatment building	Health: toxic by ingestion; strong irritant to tissue Physical: reactive with ammonia and organic materials; flammable with organic materials	400 gallons	100 lb
Sulfuric Acid (93-98 %)	7664-93-0	Enhance back flush of ultra filter system/ cooling tower cooling water pH control	Water treatment building/ near chiller cooling tower	Health: strong irritant to all tissues, may cause minor burns to permanent damage Physical: reactive	400 gallons	1,000 lb
Synthetic Turbine Lubrication Oil	None	Lubricate rotating equipment	Contained within storage tanks on equipment skids	Health: hazardous if ingested Physical: may be flammable/combustible	560 gallons	42 gallons

a. Source: SFPUC 2005a Tables 8.12-3, 8.12-4, and 8.12-5.
b. Reportable quantities for a pure chemical, per the Comprehensive Environmental Response, Compensation, and Liability Act.

Hazardous Materials
Appendix D

Protocol for Aqueous Ammonia Spill Analysis

June 2005

AQUEOUS AMMONIA SPILL ANALYSES

1. AQUEOUS AMMONIA STORAGE TANK SPILL AT SFERP

The following assumptions were made in the HARP and SCREEN3 analyses of potential impacts due to an aqueous ammonia spill from the on-site aqueous ammonia storage tank at SFERP.

Dispersion Analysis Using Harp

Used screening meteorological data (provided in HARP)	
Area source:	24 inch diameter drain to underground storage tank (1.8 ft x 1.8 ft)
Release height:	4 feet (assumed; this is min height allowed in HARP)
Emission rate:	2.7 g/m^2/sec (derived using QR algorithm), which is equivalent to 6.26 lb/hour ammonia
Urban	
Fine grid:	500 m with 10 m resolution
Receptors modeled:	Nearest residence Nearest sensitive receptor Fenceline receptor/nearest workplace
Distances determined to:	75 ppm 2 ppm (odor threshold)

Dispersion Analysis Using SCREEN3

Area source, Urban	
Area source:	24 inch diameter drain to underground storage tank (0.54 m x 0.54 m)
Emission rate:	2.7 g/m^2/sec (derived using QR algorithm)
Stability class:	6
Wind speed:	1.5 m/sec
Receptors modeled:	Nearest residence Nearest sensitive receptor Fenceline receptor/nearest workplace
Distances determined to:	75 ppm 2 ppm (odor threshold)

2. AQUEOUS AMMONIA TRUCK UNLOADING SPILL AT SFERP

The following assumptions were made in the HARP analysis of potential impacts due to an aqueous ammonia spill during truck unloading at SFERP.

Dispersion Analysis Using Harp

Used screening meteorological data (provided in HARP)	
Area source:	4 inch diameter drain to underground storage tank (0.3 ft x 0.3 ft)

Release height:	4 feet (assumed; this is min height allowed in HARP)
Emission rate:	2.7 g/m^2/sec (derived using QR algorithm), which is equivalent to 0.17 lb/hour ammonia
Urban	
Fine grid:	500 m with 10 m resolution
Receptors modeled:	Nearest residence Nearest sensitive receptor Fenceline receptor/nearest workplace
Distances determined to:	75 ppm 2 ppm (odor threshold)

Dispersion Analysis Using SCREEN3

Could not use SCREEN3 for this small drain size.

Hazardous Materials Appendix D Table 1: Aqueous Ammonia Storage Tank Spill at SFERP

SFERP: AQUEOUS AMMONIA STORAGE TANK SPILL

ALGORITHM

$$QR = \frac{(0.0035)(u^{0.78})(MW^{(2/3)})(A)(VP)}{(T)}$$

INPUT

Wind speed (u)	1.5	m/sec
Stability class	F	
Terrain	Urban	
Molecular weight (MW)	17	g/g-mole
Vapor pressure (VP)	332	mm Hg
Temperature	112	°F
Temperature (T1)	44	°C

VARIABLES

Diameter of drain	24	in
Area of drain in feet	3.14	ft^2
Side length of drain	1.77	ft
Area of drain in meters	0.29	m^2
Side length of drain	0.54	m

EMISSIONS (used in SCREEN3)

QR	0.10	lb/min
QR	0.79	g/sec
QR	2.7	g/m2/sec

EMISSIONS (used in HARP)

QR	6.26	lb/hr
QR	5.48E+04	lb/yr

Concentrations at discrete distances using SCREEN3:

Distance (feet)	Distance (meters)	Airborne Concentration (µg/m3)	Airborne Concentration (ppm)	
30	9	8.81E+04	127	Maximum concentration
46	14	6.50E+04	94	Fenceline receptor/nearest workplace
56	17	5.04E+04	73	approx. 75 ppm
400	122	1.41E+03	2	2 ppm
958	292	2.81E+02	0.4	Warm Water Cove Public Access Area
1,759	536	9.76E+01	0.1	Nearest residence

Concentrations at discrete distances using HARP:

Distance (feet)	Distance (meters)	Airborne Conc. (µg/m3)	(ppm)	
20	6	1.88E+05	271	Maximum concentration
20	6	1.61E+05	232	2nd max concentratin
46	14	6.56E+04	95	Fenceline receptor/nearest workplace
59	18	5.20E+04	75	75 ppm
479	146	1.40E+03	2.0	2 ppm
958	292	3.73E+02	0.5	Warm Water Cove Public Access Area
1,759	536	1.37E+02	0.2	Nearest residence

NOTE:
The receptor at maximum conc. is located on-site, about 20 feet from the ammonia storage tank.
The fenceline receptor/nearest workplace is located on the eastern property boundary, about 46 feet from the tank.
The receptor at 2 ppm is located approximately 479 feet east of the east property boundary.
The nearest sensitive receptor is located approximately 550 feet north of the northern property boundary at Warm Water Cove (approx. 958 feet from the ammonia storage tank).
The nearest residence is located approximately 1,659 feet east of the eastern property boundary (approx. 1,759 feet from the ammonia storage tank).

Aqueous ammonia vapor pressure obtained from EPA 1999; represents 30% aqueous ammonia, wind speed of 1.5 m/sec

EPA 1999. "Risk Management Program Guidance for Offsite Consequence Analysis." Office of Solid Waste and Emergency Response. April. www.epa.gov/ceppo/

Hazardous Materials Appendix D Table 2: Aqueous Ammonia Truck Unloading Spill at SFERP

SFERP: AQUEOUS AMMONIA TRUCK UNLOADING SPILL

ALGORITHM

$$QR = \frac{(0.0035)(u^{0.78})(MW^{(2/3)})(A)(VP)}{(T)}$$

INPUT

Wind speed (u)	1.5	m/sec
Stability class	F	
Terrain	Urban	
Molecular weight (MW)	17	g/g-mole
Vapor pressure (VP)	332	mm Hg
Temperature	112	°F
Temperature (T1)	44	°C

VARIABLES

Diameter of drain	4	in
Area of drain in feet	0.087	ft^2
Side length of drain	0.30	
Area of drain in meters	0.0081	m^2
Side length of drain	0.090	m

EMISSIONS (used in SCREEN3)

QR	0.0029	lb/min
QR	0.022	g/sec
QR	2.7	g/m2/sec

EMISSIONS (used in HARP)

QR	0.17	lb/hr
QR	1.52E+03	lb/yr

Could not use SCREEN3 for this small drain size.

Concentrations at discrete distances using HARP:

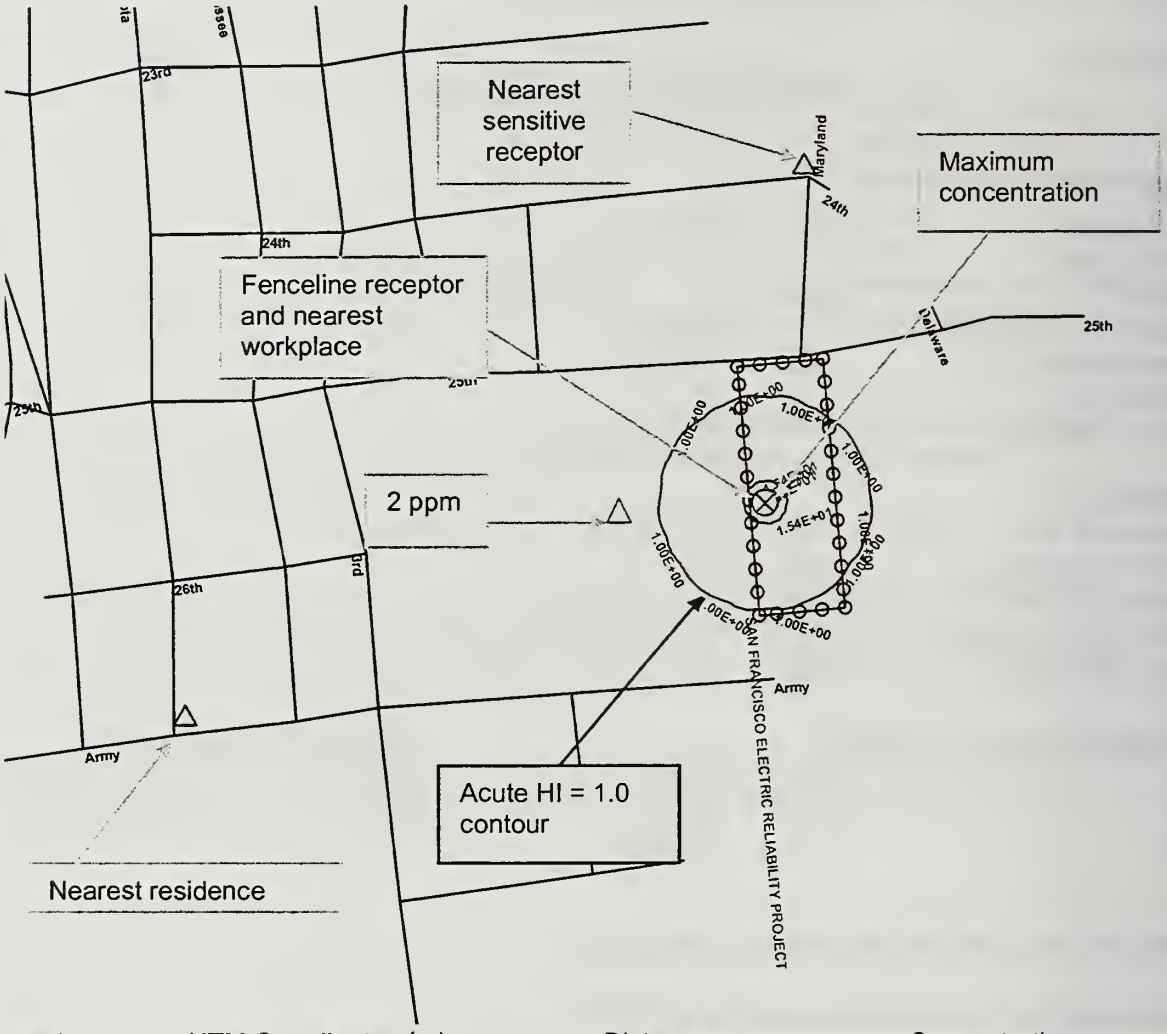
Distance (feet)	Distance (meters)	Airborne Conc. (µg/m3)	Airborne Conc. (ppm)	
30	9	2.63E-02	3.79E-05	Maximum concentration
46	14	9.60E-03	1.38E-05	Fenceline receptor/nearest workplace
958	292	1.65E-03	2.38E-06	Nearest sensitive receptor
1,759	536	1.59E-04	2.29E-07	Nearest residence

NOTE:
The receptor at maximum conc. is located on-site, about 28 feet from the ammonia storage tank.
The fenceline receptor/nearest workplace is located on the eastern property boundary, about 46 feet from the tank.
The nearest sensitive receptor is located approximately 550 feet north of the northern property boundary at Warm Water Cove.
The nearest residence is located approximately 1,659 feet east of the eastern property boundary.

Aqueous ammonia vapor pressure obtained from EPA 1999; represents 30% aqueous ammonia, wind speed of 1.5 m/sec

EPA 1999. "Risk Management Program Guidance for Offsite Consequence Analysis." Office of Solid Waste and Emergency Response. April. www.epa.gov/ceppo/

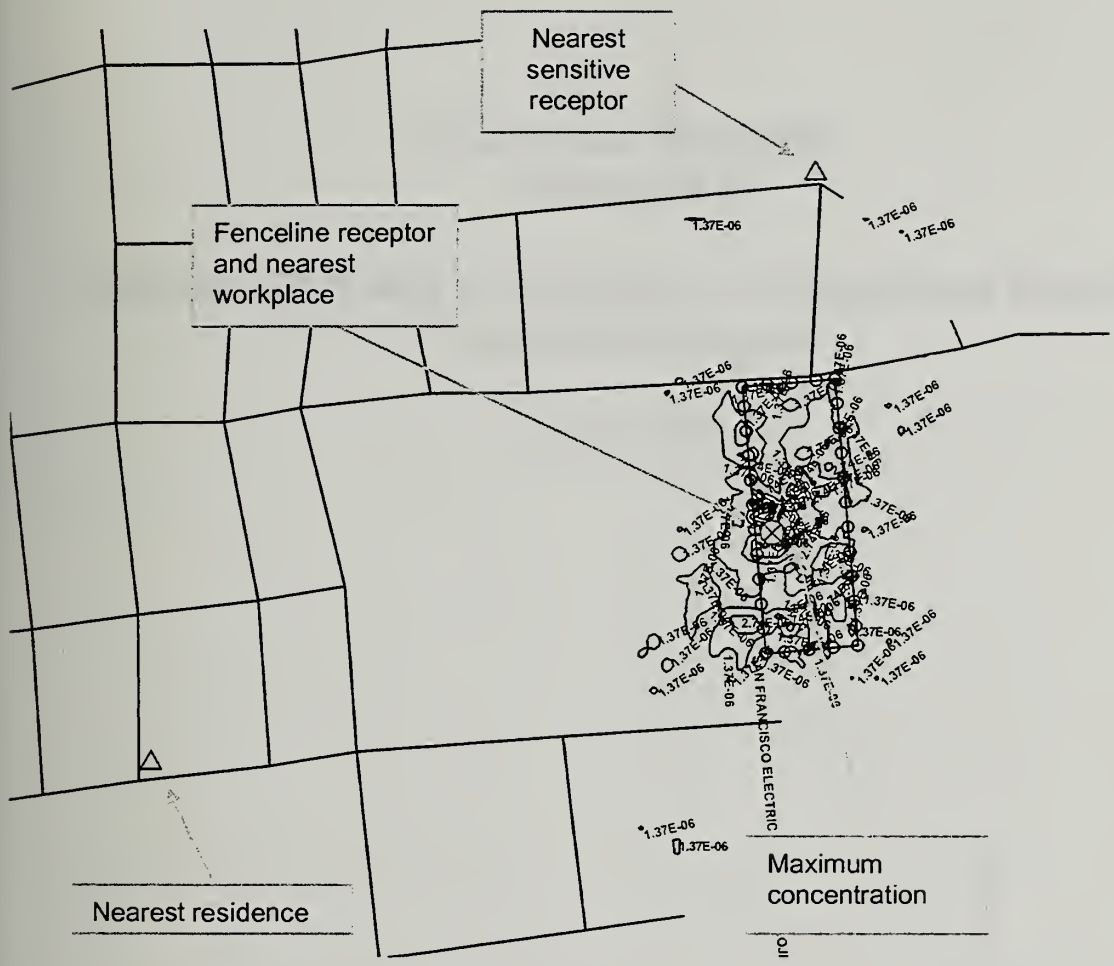
Hazardous Materials Appendix D Figure 1: SFERP Aqueous Ammonia Storage Tank Spill, Fine Grid (spill at SFERP only)



Receptor	UTM Coordinates (m)	Distance	Concentration ug/m3	ppm
Maximum conc.	554380, 4178273	20 ft from Aq. Ammonia tank	1.9E+05	271
2nd max conc.	554370, 4178273	20 ft from Aq. Ammonia tank	1.6E+05	232
Fenceline	554361, 4178272	46 ft east of Aq. Ammonia tank	6.6E+04	95
75 ppm	554380, 4178253	59 ft from Aq. Ammonia tank	5.2E+04	75
2 ppm	554230, 4178283	479 ft from Aq. Ammonia tank	1.4E+03	2.0
Nearest sensitive receptor (Warm Water Cove)	554410, 4178560	550 ft north of property	3.7E+02	0.5
Nearest residence	553872, 4178085	1,859 ft east of property	1.4E+02	0.2

Note: Blue circles are boundary receptors of SFERP
Pink circle containing an X is the location of the ammonia storage tank
Contours represent acute hazard index values

Aqueous Ammonia Truck Unloading Spill, Fine Grid (spill at SFERP only)



Receptor	UTM Coordinates (m)	Distance	Concentration ug/m3	ppm
Maximum conc.	554380, 4178263	28 ft from aq. ammonia tank	2.6E-02	3.8E-05
Fenceline	554361, 4178272	46 ft east of aq. ammonia tank	9.6E-03	1.4E-05
Nearest sensitive receptor (Warm Water Cove)	554410, 4178560	550 ft north of property	1.7E-03	2.4E-06
Nearest residence	553872, 4178085	1,659 ft east of property	1.6E-04	2.3E-07

Note: Blue circles are boundary receptors of SFERP
Pink circle containing an X is the location of the ammonia storage tank
Contours represent acute hazard index values

Hazardous Materials
Appendix E

Facilities That May Contribute to a Hazardous Materials Cumulative Impact

June 2005

Hazardous Materials Appendix E Table 1: Facilities in the Project Vicinity That May Contribute to a Hazardous Materials Cumulative Impact

Facility	ID # (& Index for Figure 1)	Address	Materials Of Interest*	Total Amount Stored On Site**	Distance From SFERP (in miles)
ALHAMBRA WATER	12	2217 Revere AV	Propane	34000 ft^3	1.5
American Linen Alsco	12131	1575 Indiana St	Laundry Detergent, Bleach, Liquid Antichlor, Sulfuric Acid, Kerosene, Lubricants, Acetylene, Oxygen, Aragon, Carbon Dioxide	601 ft^3 11605 gal	0.4
ANCHOR BREWING CO.	1835	1705 MARIPOSA ST	**Anhydrous ammonia** Polyciar 10	347932 ft^3 1522 gal	1.3
AUTO CHLOR SYSTEM OF NO CA	9848	97125TH ST	Potassium Hydroxide, Alcohols, Phosphoric Acid, Ammonium Hydroxide, Autochlor Concentrate No. 17	17074 gal	0.4
Baker Distributing Co	4867	1501 MINNESOTA ST	Refrigerant gasses Nitrogen, Carbon Dioxide, Acetylene, Oxygen (liquid)	250500 ft^3 200 gal	0.3
C.J. FIGONE COLD STORAGE	3829	42017TH ST	**Anhydrous ammonia** Bleach Lubricants	83520 ft^3 148 gal	1.1
CCSF/CENTRAL SHOPS/ADMIN SVCS	2283	2323 Cesar Chavez ST	Fuels Break Fluid Antifreeze Sulfuric Acid	116246 ft^3 986 gal	0.95
CCSF/DPW/BSR/ Asphalt Plant	9386	1801 Jerrold Av	Propane, Anhydrous Aluminum Sulfate, Oxygen, Acetylene, Asphalt Materials, Paint	13806 ft^3 28910 gal	1.0
CCSF/DPW/ Buildings & Ground	9428	2323 Cesar Chavez St	Paint, Solvent, Cleaner, Dynamite, TNT	12797 ft^3 5161 gal	1.1
CCSF/PTD/MUNI /Maintenance	22948	1399 Marin St	Fuels, Diesel fuel, Waste oil, lubricants	19430 gal	0.4
CCSF/PTD/MUNI /WAYS & STRUCTURES MAINTENANCE	26108	700 Pennsylvania Av	Oils, Diesel Fuel, Solvent, Thinner, Petroleum, Cleaners, Adhesives, Acetylene, Propane, Oxygen, Aragon, Carbon Dioxide	26133 ft^3 1000 gal	0.7
CCSF/PTD/MUNI /Woods	7601	1095 Indiana St	Solvents, Motor Oil, Adhesive, Paint, Acetylene	5892 ft^3 5942 gal	0.53
CCSF/PUC/WPC/ SEP/ NORTH SIDE And SOUTH SIDE	2011 9550	750 PHELPS ST 1701 JERROLD AV	Sodium Hypochlorite, Sodium Bisulfite, Phosphoric Acid, Propane, Gasoline, Oxygen, Argon,	9840 ft^3 176825 gal 105374 ft^3 40183 gal	0.86

			Acetylene, Hydrogen, Paints, Thinners, Oils, Disinfectant Cleaners, Lab Chemicals.		
CIRCOSTA IRON & METAL CO INC	10089	1801 EVANS AV	Solvent, Oils, Acetylene, Oxygen, Diesel Oil, Propane, Antifreeze, Gasoline	3954 ft^3 16704 gal	0.75
DARLING INTERNATIONAL Inc	2724	429 Amador ST, Pier 92	Sodium Hydroxide Sulfuric Acid Acetylene Sodium Hypochloride	3650 ft^3 9760 gal	0.45
DORSETT & JACKSON CO	9363	100117TH ST	Butanol Ethylene Glycol	817 ft^3 10821 gal	1.1
GROWERS REFRIGERATION INC	3446 (not on map)	2050 GALVEZ AV	**Anhydrous ammonia**	591 ft^3 1136 gal	0.87
Lawson Roofing Co., Inc.	10015	1495 Tennessee St	Propane, Petroleum, Asphalt Materials	53134 ft^3 475 gal	0.39
LIGHT SODA ON TAP	4377	2291 PALOU AV	Carbon Dioxide, Nitrogen, Helium, Various small amounts of compressed gasses, R12 (Liquefied gas)	155506 ft^3 54 gal	1.4
MacKenzie Warehouse	21691	1601 Mariposa St	Solvents, Petroleum, Paint, R 134 Freezer	278 ft^3 13621 gal	1.3
PAN GLO SERVICES	4656	1550 CUSTER AV	Solvents, Alkali, Glycol, Oxygen, Acetylene Phosphoric Acid Propane	1068 ft^3 18062 gal	0.6
PG&E/Potrero G.C. Yard	23400	1201 Illinois ST	Solvents, Fuels, Nitrogen, Paints, Propane, Butane, Xylene; Acetone, Methyl-propyl-ketone	12496 ft^3 892.53 gal	0.3
PG&E/Potrero Switchyard	25464	1201 Illinois St	Batteries (Sulfuric Acid), Sulfur Hexafluoride, Nitrogen, Diesel fuel, Oils, Gasoline, Paints	423 ft^3 42580 gal	0.3
Potrero, LLC (Mirant)	23264	1201 Illinois ST	Aqueous ammonia, Sodium Hypochlorite, Sodium Hydroxide, Hydrogen.	20,000 gal 2,000 gal 600 gal 5,850 ft^3	0.35
SAN FRANCISCO PETROLEUM COMPANY	667	2121 3RD ST	Gasoline Diesel Fuel Solvent Kerosene Motor Oil Grease	101,000 gal	0.9
SF Dry Dock Inc	26128	Pier 70	Welding Gasses, Fuels (Gasoline, Diesel, Kerosene), Cilicon Base, Oils, Corrosion Inhibitors, Adhesives, Paint, Paint Products, Xylene.	17000 ft^3 17438 gal	0.83

TRAYER ENGINEERING CORP.	2824	898 PENNSYLVANIA AV	Aragon Carbon Dioxide Oxygen Helium Sulfur Hexafluoride Acetylene Nitrogen Hydrogen	51233 ft^3 13752 gal	0.58
WESTERN PRINTING INK CORP	62	777 TENNESSEE ST	Ink Flush Varnish	6046 gal	0.6
White Cap Construction Supply Inc	22363	122506th St	Waste Oil	51009 ft^3 1187 gal	1.56
Airgas NCN	26828	52523rd ST	Argon, Nitrogen Helium, Neon, Carbon Dioxide, Oxygen, Nitrous Oxide, Propane, Methatne, Acetylene, Hydrogen.	213000 ft^3	0.28
MV Transportation	26872	355003rd St	Glass Cleaner, Freon, Antifreeze, Waste Oil, Hydraulic Oil, Diesel Fuel	400 ft^3 11350 gal	0.65
Nella Oil/#437	27428	269003rd St	Natural Gas, Gasoline, Diesel Fuel, Bio Diesel.	30000 ft^3	0.45

* Staff only included in this table liquid and gas materials that may contribute to a hazardous materials cumulative impact.
**Source: inventory data received on CDs from the SFDPH (SFDPH 2004b; SFDPH 2004c). Amounts stated in ft^3 are gas, and amounts stated in gallons are liquids.

Hazardous Materials
Appendix F

Protocol for Simultaneous Aqueous Ammonia Storage Tank Spills at SFERP and Mirant Potrero

June 2005

PROTOCOL FOR SIMULTANEOUS AQUEOUS AMMONIA STORAGE TANK SPILLS AT SFERP AND MIRANT POTRERO

The following assumptions were made in the HARP and SCREEN3 analyses of potential impacts due to a simultaneous aqueous ammonia spill from the on-site aqueous ammonia storage tanks at SFERP and Mirant (approximately 1875 feet apart).

Dispersion Analysis Using Harp

Used screening meteorological data (provided in HARP)	
Area source - SFERP:	24 inch diameter drain to underground storage tank (1.8 ft x 1.8 ft)
Area source - Mirant:	42 inch diameter drain to underground storage tank (3.1 ft x 3.1 ft)
Release height:	4 feet (assumed; this is min height allowed in HARP)
Emission rate:	2.7 $g/m^2/sec$ (derived using QR algorithm), which is equivalent to 6.26 lb/hour ammonia for SFERP and 19.2 lb/hour ammonia for Mirant
Urban	
Fine grid:	500 m with 10 m resolution
Receptors modeled:	Nearest residence Nearest sensitive receptor SFERP fenceline receptor/nearest workplace
Distances determined to:	75 ppm 2 ppm (odor threshold)

Hazardous Materials Appendix F Table 1: Simultaneous Aqueous Ammonia Storage Tank Spills at SFERP and Mirant Potrero

SFERP & MIRANT: SIMULTANEOUS AQUEOUS AMMONIA STORAGE TANK SPILL

ALGORITHM

$$QR = \frac{(0.0035)(u^{0.78})(MW^{(2/3)})(A)(VP)}{(T)}$$

INPUT

Wind speed (u)	1.5	m/sec
Stability class	F	
Terrain	Urban	
Molecular weight (MW)	17	g/g-mole
Vapor pressure (VP)	332	mm Hg
Temperature	112	°F
Temperature (T1)	44	°C

VARIABLES	**SFERP**	**MIRANT**	
Diameter of drain	24	42	in
Area of drain in feet	3.14	9.62	ft^2
Side length of drain	1.77	3.10	ft
Area of drain in meters	0.29	0.89	m^2
Side length of drain	0.54	0.95	m

EMISSIONS (used in HARP)

	SFERP	**MIRANT**	
QR	0.10	0.32	lb/min
QR	6.26	19.17	lb/hr
QR	5.48E+04	1.68E+05	lb/yr
QR	0.79	2.42	g/sec
QR	2.7	2.7	g/m2/sec

Concentrations at discrete distances using HARP:

Distance (feet)	Distance (meters)	Airborne (µg/m3)	Conc. (ppm)	
7	2	9.37E+05	1,350	Maximum concentration (2 m from Mirant tan
26	8	4.44E+05	640	2nd highest concentration (8 m from Mirant t
128	39	5.23E+04	75	Distance from Mirant ammonia tank
1,345	410	2.25E+03	3	SFERP fenceline receptor/nearest workplace (1 from Mirant tank)
873	266	1.89E+03	2.7	Warm Water Cove Public Access Area (266 m Mirant tank)
1,063	324	1.40E+03	2.0	Distance from Mirant ammonia tank (324 m from SFERP property)
1,759	536	3.13E+02	0.5	Nearest residence to SFERP

NOTE:

The receptor at maximum conc. is located on the Mirant site, about 7 feet from the ammonia storage tank.

75 ppm occurs on Mirant site, approximately 39 meters (128 feet) from the Mirant ammonia tank.

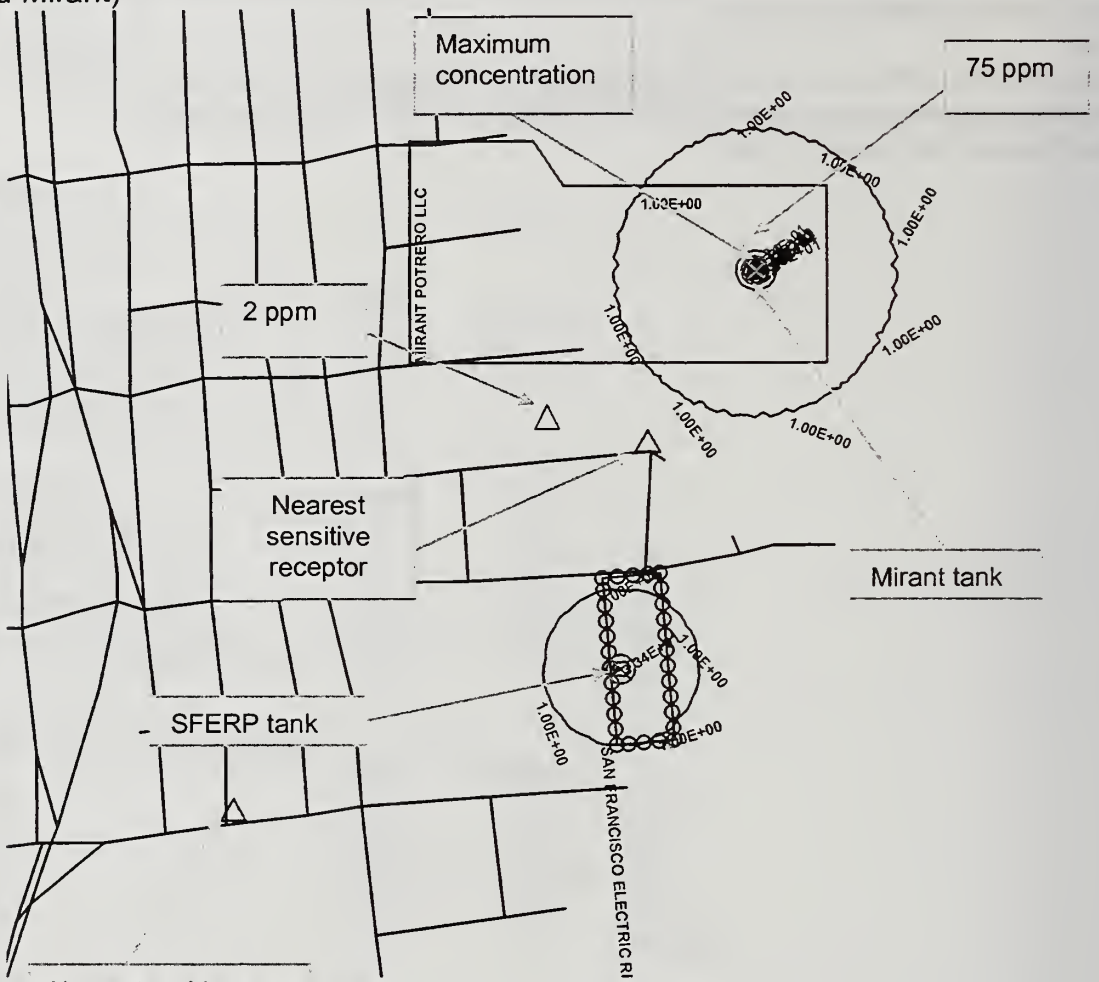
The SFERP fenceline receptor/nearest workplace is located at the northeastern corner of SFERP, approximately 441 feet from SFERP ammonia tank and 1,346 feet from Mirant ammonia tank.

The nearest sensitive receptor is located approximately 550 feet north of the northern SFERP property boundary at Warm Water Cove, 873 feet from the Mirant ammonia tank.
The receptor at 2 ppm is located 324 m (1,063 feet) from the Mirant tank, approximately 700 feet from SFERP northern property boundary.
The nearest residence to SFERP is located approximately 1,659 feet east of the eastern property boundary, which is 3,200 feet from Mirant ammonia tank.

Aqueous ammonia vapor pressure obtained from EPA 1999; represents 30% aqueous ammonia, wind speed of 1.5 m/sec
EPA 1999. "Risk Management Program Guidance for Offsite Consequence Analysis." Office of Solid Waste and Emergency Response. April. www.epa.gov/ceppo/

Hazardous Materials Appendix F Figure 1: Simultaneous Aqueous Ammonia Tank Spills at SFERP and Mirant Potrero, Fine Grid

Simultaneous Aqueous Ammonia Tank Spill, Fine Grid (simultaneous spills at SFERP and Mirant)



Recep	Nearest residence	nates (m)	Distance	Concentration ug/m3	ppm
Maximum conc.	554550, 4178783		7 ft from Mirant tank	9.37E+05	1,350
2nd highest conc.	554550, 4178793		26 ft from Mirant tank	4.44E+05	640
75 ppm	554560, 4178823		128 ft from Mirant tank	5.23E+04	75
SFERP Fenceline	554426, 4178394		1,345 ft from Mirant tank	2.25E+03	3
Nearest sensitive receptor (Warm Water Cove)	554410, 4178560		550 ft north of SFERP property	1.89E+03	2.7
2 ppm	554290, 4178593		1,063 ft from Mirant tank (700 feet from SFERP property)	1.40E+03	2.0
Nearest residence to SFERP	553872, 4178085		1,659 ft east of SFERP property	3.13E+02	0.5

Note: Blue circles are boundary receptors of SFERP
Pink circle containing an X is the location of the ammonia storage tank
Contours represent acute hazard index values

LAND USE

David Flores

SUMMARY OF CONCLUSIONS

The project will comply with all applicable land use laws, ordinances, regulations and standards. The proposed power plant will be compatible with existing and planned land uses because: 1) it is consistent with the current general plan and zoning designations for the property; 2) it is compatible with the heavy industry and port character of the immediately adjacent land uses north and south of the site, and with the commercial character of the land use on 25th Street; and 3) the project does not abut any zoned residential areas.

INTRODUCTION

The land use analysis of the San Francisco Electric Reliability Project (SFERP) focuses on two main issues: the project's consistency with local land use plans, ordinances, and policies; and the project's compatibility with existing and planned land uses. In general, a power plant and its related facilities have the potential to create impacts in the areas of noise, dust, air emissions, public health, traffic, and visual resources, as well as other environmental areas. These individual resource topics are discussed in separate sections of this document.

LAWS, ORDINANCES, REGULATIONS AND STANDARDS

LAND USE Table 1
Laws, Ordinances, Regulations, and Standards (LORS)

Applicable Responsible Agencies	Description
Federal	The proposed project is not located on federally administered public lands, therefore is not subject to federal regulations pertaining to land use.
State	The authority to regulate land use and development on private property is delegated to local jurisdictions by the state. As a result, there are no specific state-level land use LORS applicable to the project or the site.
Local	
Port of San Francisco	The Port of San Francisco administers Pier 70. The Port is an "enterprise agency" of the City of San Francisco. The Waterfront Land Use Plan promotes expansion of cargo and maritime uses on Port lands, and to enhance wetlands, public access, and open space.

City/County of San Francisco Objectives and Policies-Part 1	Land Use, Industry, and Urban Design elements of the City/County of San Francisco General Plan/Central Waterfront Area Plan The overall goal of this plan is to create a physical and economic environment conducive to the retention and expansion of San Francisco's industrial and maritime activities. This goal is set forth in order to reverse the pattern of economic decline in the area and establish a land base for the industrial and maritime components of the San Francisco economy.

SETTING

The SFERP site consists of approximately four acres and is situated within Potrero Point along the eastern shoreline of the San Francisco Bay between Central Basin in the north and Islais Creek Channel in the south. This area of San Francisco is referred to as the Central Waterfront and is dominated by industrial uses. The site is bounded by Illinois Street and San Francisco Bay, between 25th and 26th Streets. Site access is by way of 25th Street, approximately 900 feet east of Illinois Street.

PROJECT SITE AND VICINITY DESCRIPTION

LAND USE Figure 1 shows the existing land uses in the project vicinity. Potentially sensitive land uses within the affected area are shown in **LAND USE Table 1**. This table does not list residential properties or live/work units, which are discussed below.

Industrial and commercial uses predominate in the immediate site vicinity. Pier 70 (i.e., a Port of San Francisco property) is immediately north of the SFERP site. Current uses at Pier 70 include general industry within an M-2 Heavy Industry zone.

The generation unit would be erected on a site owned by the City of San Francisco. There are no permanent structures on the site, although a temporary concrete batch plant occupies the northern portion of the project site. The area immediately east of the project site, within the proposed staging area, is currently used as a trailer storage facility for a trucking operation.

The closest residentially zoned areas occur south and west of the SFERP. The Bayview-Hunters Point neighborhood is less than one mile south of the site at its nearest point. To the west, closer residential areas occur on Potrero Hill, along Third Street, and in the small community known as Dogpatch on Third Street near 22nd Street. Dogpatch is the nearest residentially zoned area to the project (approximately 0.75 miles to the northwest).

LAND USE – TABLE 1

Potentially Sensitive Land Uses within the Affected Area

Land Use[1]	Approximate Distance from the Proposed Project Site[2]
Supreme Master Ching Hai International (Lecture and Publishing Center)	474 feet
Warm Water Cove Park	705 feet
Islais Creek Channel (Park)	1,721 feet
St. Stephen Baptist Church	2,364 feet
Starr King Elementary School	2,844 feet
Daniel Webster Elementary School	4,630 feet
Youngblood Coleman Playground	4,596 feet
Potrero Hill Playground	4,228 feet
St. Teresa's Church	4,720 feet
Potreo Library	4,624 feet
First Russian Christian Church	4,911 feet
Esprit Park	3,620 feet
Rise Institute (Teacher Support Center)	3,023 feet
Pathfinders Mission Baptist Church	4,288 feet
New Beginning Church of God	5,080 feet

[1] Does not include residential land uses

[2] The affected environment consists of the area within one mile (5,280 feet) of the generating plant site.

The relative scarcity of housing throughout San Francisco has led the CCSF to allow live/work lofts in areas not zoned for residential use. From 1997 through 2000, the San Francisco Planning Commission approved approximately 3,000 live/work units in the city. In the year 2000, 1,626 new housing units were constructed in the city, of which 464 were live/work units. Reflecting the trend of building residential loft units in non-residential areas, San Francisco's 2000 Housing Inventory (a statistical report of San Francisco's housing production trends and projections) indicates that 38 percent of new housing construction occurred in industrial and heavy commercial zoning districts, 19 percent occurred in South of Market area zoning districts, and 11 percent occurred in neighborhood commercial zoning districts.

The Central Waterfront area has also experienced an increase in residential units in previously non-residential areas through the development of live/work units. As a result, the residential population in the vicinity of the SFERP has increased through infiltration of live/work units. As discussed in the AFC (pg. 8.4-12), applications for 398 housing units have recently been approved or are pending approval in the Central Waterfront area which contain neighborhood commercial, mixed industrial/Commercial, and Light Industrial zoned areas.

Planned Local Land Use Changes

The CCSF and the Port of San Francisco are engaged in extensive planning and development activities in the vicinity of the SFERP site.

North of the SFERP site, at the Port of San Francisco's Pier 70, plans call for mixed uses in the future, including approximately 610,000 square feet of commercial office and/or research and development space; 100,000 feet of retail/commercial space; and 240,000 square feet of public access and recreational uses. There is no set schedule for this development; however, it is anticipated that about 150,000 square feet of arts and non-profits space is expected to be developed within the next two years, and 500,000 square feet of commercial space will be developed in the next 3-5 years.

To the west, the San Francisco Municipal Railway (MUNI) construction is underway at the Third Street Light Rail Extension. Station stops along the route in the vicinity of Third Street are expected to encourage commercial and, perhaps, residential development. In support of the new transit line, MUNI is constructing a new Metro East Operating and Maintenance Facility which will be built on approximately 13-17 acres at 25th and Illinois Streets for storing, maintaining and dispatching light rail vehicles. Construction work has not begun on this site.

On January 22, 2003, CCSF released the public review draft of the Central Waterfront Neighborhood Plan. The plan does not propose any housing proposals east of Illinois Street, due to the existence and nature of viable industrial uses in the area. The plan does call for mixed use residential between Tennessee Street and Illinois Street from 23rd Street to 25th Street.

There has been community opposition to earlier drafts of the Central Waterfront Neighborhood Plan that proposed housing along 24th Street. Concerns seemed to be based primarily on the perceived environmental hazards stemming from the existing Potrero power plant. To date, this neighborhood plan is still under review and receiving public comments.

The CCSF planning staff has formulated a Preferred Concept Plan for the Central Waterfront that proposes to increase the supply of housing in the planning area, but continues to designate the area east of Third Street for industrial uses.

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

The Guidelines to the California Environmental Quality Act (CEQA), Appendix G, note that a project may have a significant effect on land use if the project will, among other things:

- Physically divide an established community, or
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

A project may also have a significant impact on land use if it would create unmitigated noise, dust, public health hazard or nuisance, traffic or visual impacts, or when it precludes or unduly restricts existing or planned future uses.

When determining if a project is in conformance with ordinances or regulations, Energy Commission staff typically meets and consults with applicable agencies to determine conformity and, when necessary, "to attempt to correct or eliminate any noncompliance" [Pub. Resources Code, Sect. 25523(d)(1)]. The land use laws, ordinances, regulations, standards (LORS) and policies applicable to the project have been analyzed below to determine the extent to which the SFERP is consistent or at variance with each requirement or standard.

DIRECT/INDIRECT IMPACTS AND MITIGATION

Power Plant Site

The site is within a Heavy Industry zone and is bounded by industrial and port activities to the north and south. To the west, an existing structure on Illinois Street has been converted for commercial (office) use. The proposed project represents further development of a site already committed to industrial use and, therefore, would not introduce a new industrial use into a non-industrial area. The site and neighboring waterfront properties are designated in the General Plan and the Planning Code for heavy industry use. Current CCSF land use policies, as expressed in the San Francisco General Plan and the subset Central Waterfront Area Plan, indicate that industrial and residential uses are planned to continue in this area in the future. Note that the CCSF is currently in the process of formulating a neighborhood plan for the Central Waterfront area, which may result in proposals to change current land use designations.

Mixed commercial uses are encroaching on the area and, to the extent that land is not valued for industrial or port activities, port officials are accommodating these changes within future plans being drafted or in the preliminary stages of development. Residential uses have also encroached on the area due to the fact that live/work units are allowed in most areas of the city regardless of zoning. Many live/work units have been approved in the vicinity of the SFERP site in recent years. These are being allowed in full knowledge of the industrial and port nature of the existing land uses. Due to concerns about encroachment of residential units on existing industrial areas, the CCSF has established a permanent Industrial Protection Zone that would exclude residential uses. The SFERP is not located within the boundaries of the Industrial Protection Zone.

As indicated earlier, the CCSF planning staff has formulated a Preferred Concept Plan for the Central Waterfront that proposes to increase the supply of housing in the planning area. We agree with the City that these uses of new housing can be compatible, particularly if the City's policy of continued industrial use is made extremely clear to housing developers and potential new residents of the potential discomforts of noise, occasional visible water vapor plumes, and delivery vehicles in the power plant site vicinity and surrounding industrial uses.

The construction laydown area for SFERP is immediately east of the project site and would not conflict with existing or planned land uses in this industrialized area. Temporary, construction-related impacts at the project site, such as increased noise and dust, may affect adjacent land uses. With applicant and staff proposed mitigation, these construction impacts are not expected to be significant. Please see the **AIR QUALITY** and **NOISE** sections of this PSA for discussions of impacts and mitigation. Staff has found that operation of the SFERP would not cause significant, unmitigated adverse noise, dust, public health hazard or nuisance, or traffic impacts on nearby land uses.

Linear Facilities

The SFERP project would require construction of offsite linear facilities such as electric transmission lines, natural gas and domestic water lines. Recycled water is to be used by the SFERP for cooling purposes. The City will provide untreated waste water from a water pumping station to be constructed on Marin Street near Cesar Chavez Blvd, less than a mile from the project site. An on-site treatment system will provide primary, secondary, and tertiary water treatment.

Construction of the project's linear facilities will require excavating portions of local roadways, and could temporarily restrict vehicle and pedestrian access to adjacent land uses. If necessary, detours and alternative routes would be provided to maintain access to study area land uses. See the **TRAFFIC AND TRANSPORTATION** section of this PSA for further discussions of impacts and mitigation. Any restriction of access to existing land uses would be temporary, and would not result in a significant impact to adjacent land uses.

COMPLIANCE WITH LORS

SAN FRANCISCO GENERAL PLAN

The San Francisco General Plan contains ten elements, which set forth goals, objectives, and policies for the physical development of the city. The General Plan also includes Area Plans with objectives and policies for specific geographic areas of the city. The project site is in the Central Waterfront planning area that extends from Pier 48 in the north to Islais Creek in the south. **LAND USE Figure 2** shows the General Plan designations in this area, including the plant site.

1. Objective 1 of the Central Waterfront Plan is to "strengthen and expand land use essential to realizing the economic potential of the subareas" and Policy 1 encourages "the intensification and expansion of industrial and maritime uses." There are numerous other policies that call for the retention, expansion, and protection of industrial activity in this area. With this in mind, the development of new residential is not precluded.

2. Objective 6 of the Plan is to "retain and improve existing residential uses and develop a limited quantity of new housing." Therefore, the CCSF's policies imply that industrial uses and residential uses can be compatible providing that the adverse

environmental impacts of new development can be adequately mitigated (see Objective 1, Policy 3).

San Francisco Planning Code (Zoning Ordinance)

The SFERP site is within an M-2 Heavy Industry use zone. **LAND USE Figure 3** shows the zoning applicable to the area of the project. Permitted uses include steam power plants. Because the Planning Code specifically cites steam power plants as permitted uses but does not identify any other type of power plant as being permitted, staff requested a determination from the CCSF's Zoning Administrator during the processing of the Potrero Power Plant Unit 7 application as to whether a gas-fired power plant would be considered a permitted use in the M-2 zoning district. In a letter dated August 8, 2001, the Zoning Administrator determined that the type of power plant proposed by the Potrero applicant (Mirant) is permitted in the M-2 district. The Zoning Administrator further stated that other types of power plants would also be permitted in the M-2 district because the "steam " reference is outdated due to the fact that this Code section has not been updated in many years.

The site is within a 40-X Height and Bulk Zoning District, which imposes on development a height limit of 40 feet and a floor area ratio (FAR) of 5:1 (meaning a building may have a floor area equal to up to five times the site's square footage). The project's three exhaust stacks exceed the height criteria for the zoning district; but structures and equipment necessary for industrial operations are exempt as long as they do not contain separate floors [San Francisco Planning Code Section 260(b)(2)(M)].

The SFERP proposal meets the requirements of the industrial zoning district and is exempt from this particular standard.

To ensure that SFERP conforms to the CCSF's Zoning Code, staff recommends that the Commission require the following conditions of certification:

- **LAND-1** requiring compliance with the design and performance standards for the "M-2" Zoning District;
- **LAND-2** requiring compliance with the City's parking standards; and
- **LAND-3** requiring compliance with the City's outdoor advertising regulations applicable to any close up signs erected (either temporary or permanent).

San Francisco Design Review

Design review for industrial projects is conducted by the assigned city planner. It is informal and relies on guidance provided in the General Plan. There is no specific design review checklist applicable to industrial projects. The assigned planner can call on an internal design review committee if deemed appropriate, which has not occurred on this project.

CUMULATIVE IMPACTS AND MITIGATIONS

A cumulative impact consists of an impact that is created as a result of the combination of the proposed project together with other projects causing related impacts. When the

proposed project is viewed together with the effects of other projects in the area, cumulative impacts may be significant. A number of projects are proposed for development in the SFERP vicinity that could contribute to cumulative effects. These include new residential and commercial projects in the vicinity of the SFERP site, as well as various public works projects and one major new mixed-use development project (Mission Bay). **LAND USE Figure 4** presents a list of proposed or recently approved housing projects in the vicinity of the SFERP. Significant projects in the general vicinity of the SFERP site include the following:

- **Pier 70**. Immediately north of the SFERP site, extensive development of port, industrial, and commercial activities is proposed for Pier 70, an established industrial and port area. Portions of the Pier 70 site that front along Illinois Street are planned for mixed commercial opportunities. There is no specific schedule for the Pier 70 development, although about 650,000 square feet of floor area is anticipated to be built in the next five years.
- **MUNI Metro East Light Rail Maintenance and Operations Facility**. Immediately west of the SFERP site, MUNI is proposing a new facility for the storage, maintenance, and operation of MUNI's new light rail vehicles. The facility will consist of a main shop and administration building, a paint and body shop building, a small reception structure, a vehicle storage yard, and parking lot. Construction is anticipated to begin in mid September of 2005, with a 30-month construction window.
- **Rebuilding of the San Francisco General Hospital Medical Center**. In accordance with California Senate Bill 1953, which requires all California acute care hospitals to perform seismic improvements to existing buildings, the San Francisco General Hospital's Main Building will be rebuilt so that a new conforming building will be in place by the year 2013. The San Francisco General Hospital is located approximately one mile west from the SFERP along Potrero Avenue west of Highway 101, between 22nd and 23rd Streets.
- **Mission Bay**. Mission Bay is a 303-acre redevelopment project located approximately 1.5 miles north of the SFERP site, generally north of Mariposa Street and east of Interstate 280. Mission Bay is planned for approximately 6,000 housing units and over 10,000 residents. The development will also include over 5 million square feet of office, research, and manufacturing uses; 750,000 square feet of retail; 45 acres of parks and recreation; and a 500-room hotel. A new 43-acre health sciences campus for the University of California at San Francisco is currently under development at Mission Bay and will eventually contain 2.65 million square feet of space for research, instruction, and supporting uses.
- **Hunters Point Naval Shipyard Superfund Site cleanup and redevelopment project**. The former Hunters Point Naval Shipyard is located approximately one mile southwest of the SFERP site. The existence of toxic contamination at the shipyard facilities was confirmed in 1987 and the shipyard has been on the National Priorities List for toxic remediation since 1989. The Navy is currently is the process of remediating contamination at the shipyard. When the cleanup is complete, the property will be transferred to the CCSF for reuse. The CCSF designated a portion of the shipyard property as a redevelopment project area and adopted a Redevelopment Plan in 1997. The CCSF Redevelopment Agency selected a master

developer for the project in 1999 and approved a Preliminary Development Concept Plan. No new development has yet been initiated at the shipyard, pending transfer of the property from the Navy.

- **Hunters Point Power Plant.** The Hunters Point Power Plant is an existing power plant owned by PG&E, which is located at 1000 Evans Avenue, about 0.5 miles southeast of the SFERP. The Hunters Point Power Plant consists of gas-fired steam boilers designed to run continuously for long periods and distillate-fired combustion turbines designed to meet emergency conditions and/or back up the steam units. CCSF, PG&E and community leaders are currently discussing decommissioning this power plant if other energy sources become available to provide the electricity needs to the San Francisco peninsula.
- **The Port of San Francisco** prepared the Waterfront Land Use Plan to promote expansion of cargo and maritime uses on Port lands, and to enhance wetlands, public access, and open space. In 2000, the Port prepared a Supplemental EIR for the Waterfront Land Use Plan addressing specific proposals for interim uses, long-term uses, and capital improvements in the Southern Waterfront, which includes the waterfront area in the vicinity of the SFERP. Proposals in the general vicinity of the SFERP included:
  - A commercial building with 63 housing units at Cesar Chavez Street and Third Street.
  - A concrete ready-mix facility, including bulk cargo barge and rail transport, at Pier 80.
  - Pier 90-94 Backlands, a 44-acre site in the initial planning phase for a distribution and warehouse complex.
  - Pier 70 Opportunity Area (about sixty-five acres of mixed use commercial, public access, and recreational maritime uses, discussed above).

As discussed earlier in this analysis, a substantial amount of residential development has occurred in the Central Waterfront area in recent years, including numerous live/work projects in non-residential areas. The nearest residential project in the vicinity of the SFERP is a live/work project at 1300 Illinois Street (near 23rd and Illinois Street). The project consist of 175 new residential units. Other recently constructed or proposed residential projects in the Central Waterfront area are listed in **LAND USE Figure 4**.

The SFERP is consistent with the City's long-range planning policies for industrial development in this area; therefore, cumulative land use impacts are not considered significant.

The proposed project is not expected to make a significant contribution to regional impacts related to new development and growth. The SFERP is planned to serve the CCSF's existing and anticipated electrical needs of its jurisdictional boundaries.

CONCLUSIONS

The proposed building and exhaust stacks will exceed the CCSF's height limitations on structures in the Central Waterfront; however, these are exempt "structures and equipment necessary for the operation of industrial plants."

The CCSF General Plan's Commerce and Industry Element and the Central Waterfront Area Plan clearly establish that the Central Waterfront east of Third Street is an area planned for industrial and maritime uses. The Central Waterfront Area Plan emphasizes the importance of industrial and maritime uses over other uses to improve the economic base of the city. The overall goal of the Plan is "to create a physical and economic environment conducive to the retention and expansion of San Francisco's industrial and maritime activities ... to reverse the pattern of economic decline in the area and to establish a land base for the industrial and maritime components of the San Francisco economy."

The CCSF Planning Department has formulated a preliminary Preferred Concept Plan for the Central Waterfront that proposes to increase the supply of housing in the planning area, but continues to designate the area east of Third Street for industrial uses. This Plan is currently being reviewed for possible future adoption. It would be inappropriate and speculative to base any analysis of consistency with local land use policies on unadopted plans. Therefore, we must base our analysis on adopted plans, which constitute the CCSF's official policies, while acknowledging that the CCSF is in the process of updating and possibly revising these policies.

Staff is concerned that there may be some ambiguity about the City's goals of retaining and developing industrial uses, while also encouraging the development of new housing in the area. We agree with the City that these uses of new housing can be compatible, particularly if the City's policy of continued industrial use is made extremely clear to housing developers and potential new residents. New housing occupants need to be aware of the potential discomforts (possibly through a deed disclosure) such as noise, occasional visible water vapor plumes, and delivery vehicles in the power plant site vicinity and surrounding industrial uses.

Staff believes that the project is consistent with the City's land use designation and zoning for the site. Furthermore, the project would not disrupt or divide the physical arrangement of an established community. As indicated in this analysis, the project is surrounded by industrial uses, and the project would not preclude or restrict existing or planned land uses in the area.

From the land use perspective, staff recommends that the Commission certify the project and adopt the following conditions of certification if it approves the project.

CONDITIONS OF CERTIFICATION

LAND-1 The project owner shall comply with the minimum design and performance standards for the Heavy Industrial Zone District set forth in the City /County of San Francisco Zoning Ordinance.

Verification: At least 30 days prior to the start of construction, the project owner shall submit written documentation, including evidence of review by the City/County of San Francisco that the project conforms with the minimum design and performance standards of the Zoning Ordinance.

LAND-2 The project owner shall comply with the parking standards established by the City/County of San Francisco's Zoning Ordinance (Article 1.2 of the City Planning Code).

Verification: At least 30 days prior to start of construction, the project owner shall submit to the Compliance Project Manager (CPM), written documentation, including evidence of review by the City and County of San Francisco that the project conforms to all applicable parking standards.

LAND-3 The project owner shall ensure that any signs erected (either permanent or for construction only) comply with the outdoor advertising regulations established by the City/County of San Francisco's zoning ordinance (Article 6 of the City Sign Ordinance).

Verification: At least 30 days prior to start of construction, the project owner shall submit to the CPM, written documentation, including evidence of review by the City/County of San Francisco, that all erected signs will conform to the zoning ordinance.

REFERENCES

Port of San Francisco. 2000. Waterfront Land Use Plan, January 2000.

San Francisco General Plan, 1996 (as amended).

San Francisco Planning Department. 2000. Southern Waterfront Supplemental Draft Environmental Impact Report, September 2000.

San Francisco Zoning Administrator. 2001. Letter in response to a request for written determination pursuant to Planning Code § 307(a). August 8.

SFPUC 2005a – San Francisco Public Utilities Commission/Hale (tn: 34403). Amendment A of the Application for Certification. Submitted to CEC/Therkelsen/Dockets on 3/25/05.

SFERP2004a - City and County of San Francisco/Blout Application for Certification San Francisco Electric Reliability Project - 145-megawatt natural gas-fired peaking power plant located in San Francisco.

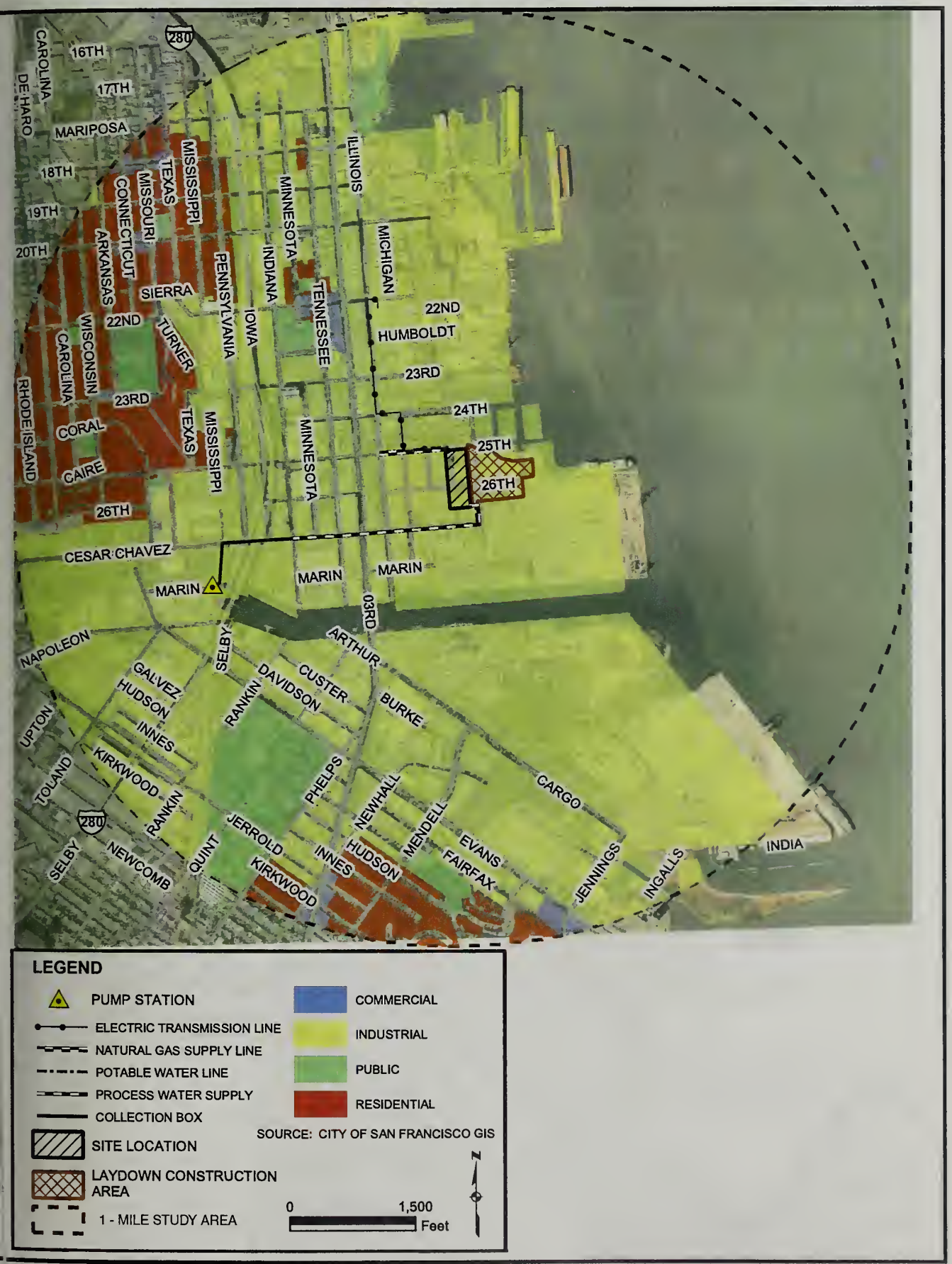
SFERP2004b - CH2MHill/Carrier. Transmittal of Appendix 5, System Impact Study. Submitted to CEC/Pfanner/Dockets on 3/18/04.

The Central Waterfront Neighborhood Plan, December 2002.

LAND USE Figure 1-4
Existing Land Uses

LAND USE - FIGURE 1

San Francisco Electric Reliability Project Supplement A - Existing Land Use Designations in the Study Area



LEGEND

- PUMP STATION
- ELECTRIC TRANSMISSION LINE
- NATURAL GAS SUPPLY LINE
- POTABLE WATER LINE
- PROCESS WATER SUPPLY
- COLLECTION BOX
- SITE LOCATION
- LAYDOWN CONSTRUCTION AREA
- 1 - MILE STUDY AREA
- COMMERCIAL
- INDUSTRIAL
- PUBLIC
- RESIDENTIAL

SOURCE: CITY OF SAN FRANCISCO GIS

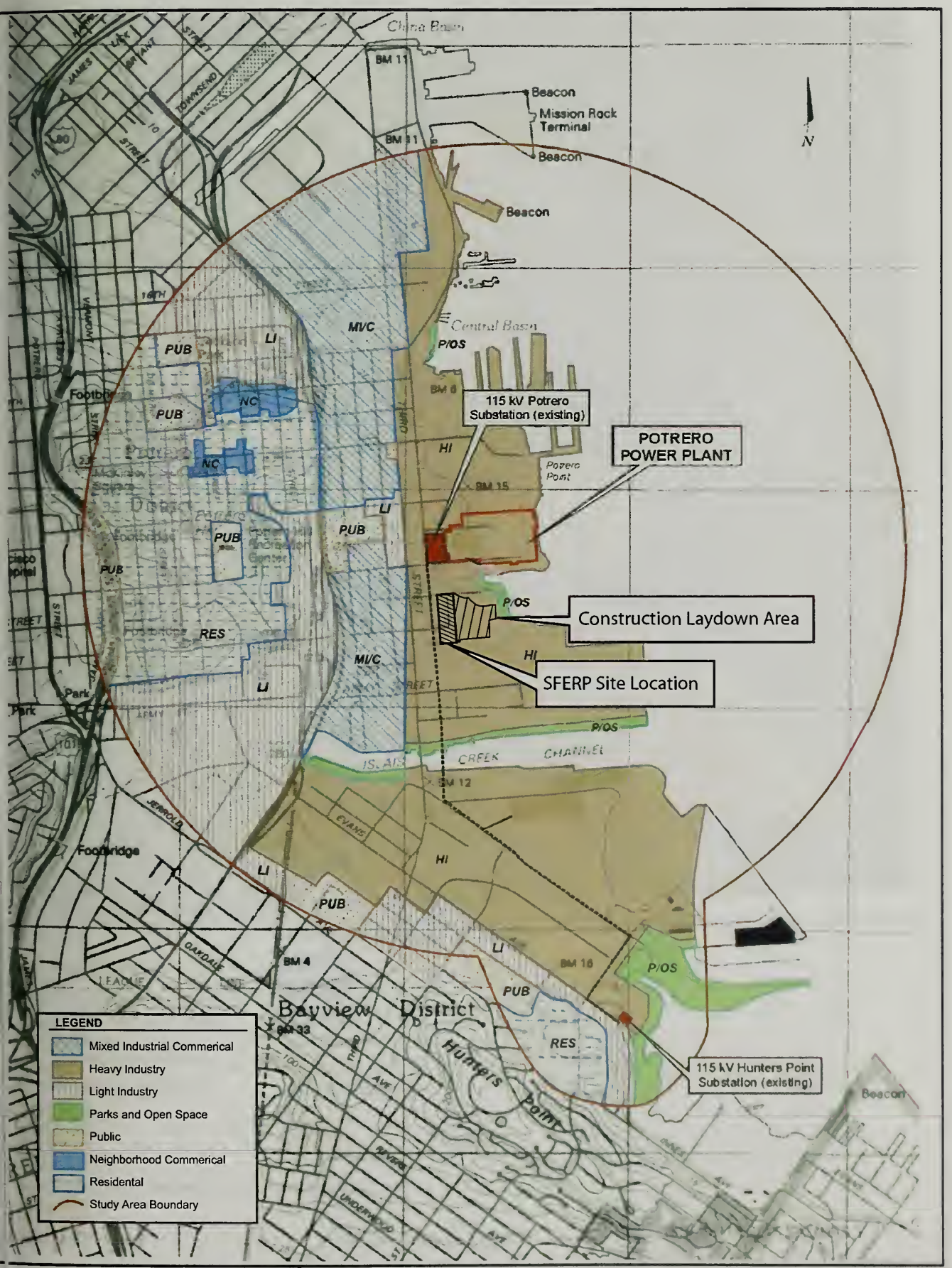
0 1,500 Feet

N

CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: AFC - Supplement A - Fig 8.4-2

LAND USE - FIGURE 2
San Francisco Electric Reliability Project Supplement A - General Plan Map



CALIFORNIA ENERGY COMMISSION, ENERGY FACILITIES SITING & ENVIRONMENTAL PROTECTION DIVISION, SEPTEMBER 2005
SOURCE: Dames & Moore Figure 8.4-1

LAND USE - FIGURE 3

San Francisco Electric Reliabilty Project Supplement A - Zoning Designations in the Study Area

LEGEND

- PUMP STATION
- SITE LOCATION
- LAYDOWN CONSTRUCTION AREA
- 1 - MILE STUDY AREA

HOUSE CHARACTER DISTRICTS

- RH-1
- RH-2
- RH-3

MIXED HOUSE AND APARTMENT CHARACTER DISTRICTS

- RM-1
- RM-2

NEIGHBORHOOD COMMERCIAL DISTRICTS

- NC-1
- NC-2
- NC-3

PUBLIC DISTRICT

- P

INDUSTRIAL DISTRICTS

- M-1
- M-2

N

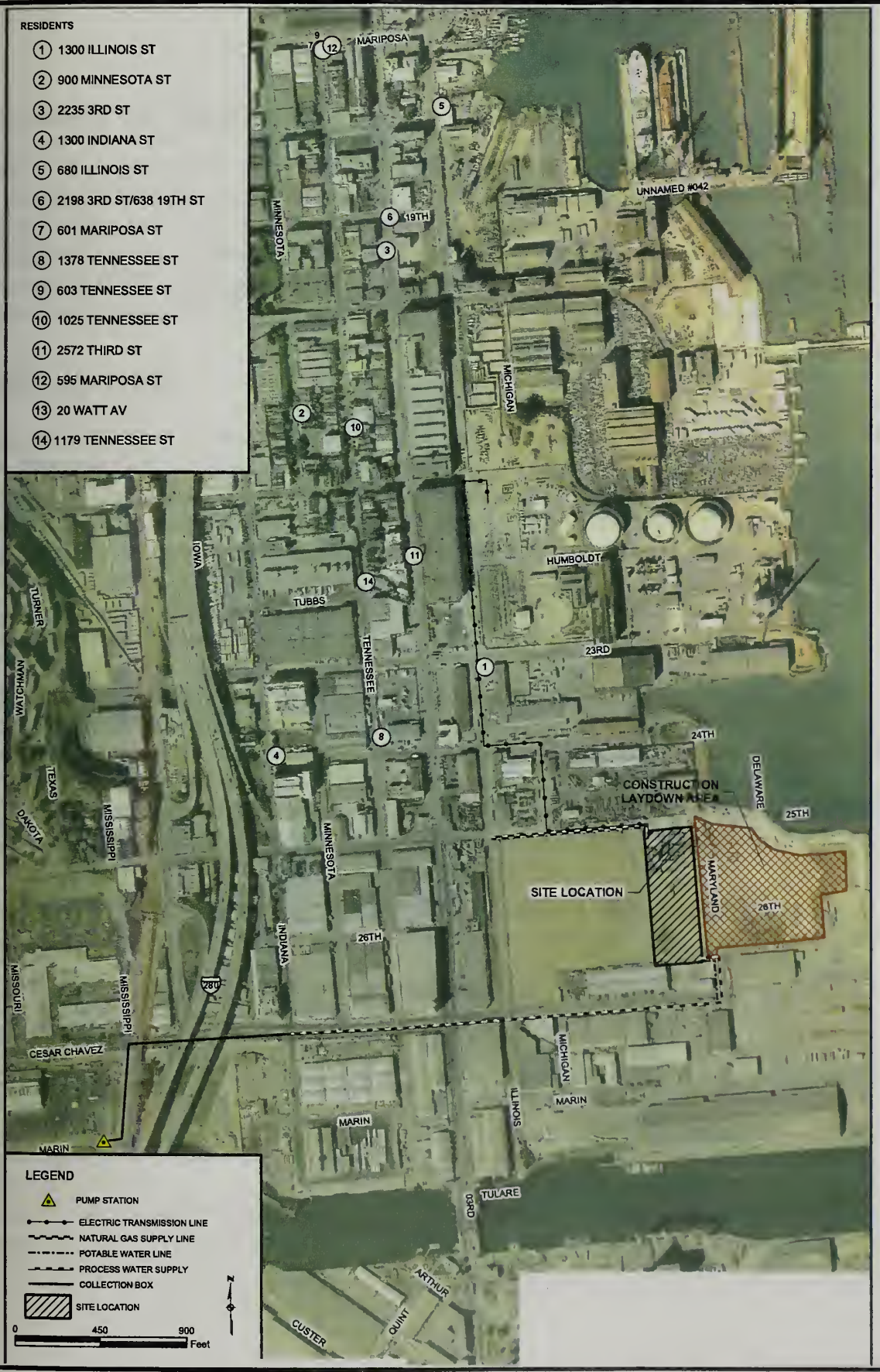
0 1,600 Feet

CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: AFC - Supplement A - Fig 8.4-3

LAND USE - FIGURE 4

San Francisco Electric Reliability Project Supplement A - Locations of Proposed or Recently Approved Housing



CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: AFC - Supplement A - Fig 8.4-5

NOISE AND VIBRATION

Steve Baker

SUMMARY OF CONCLUSIONS

The San Francisco Electric Reliability Project, if built and operated in conformance with the proposed conditions of certification below, would comply with all applicable noise and vibration laws, ordinances, regulations and standards and would produce no significant adverse noise or vibration impacts, either direct or cumulative. The applicant has proposed appropriate mitigation, in the form of good design practice and inclusion of necessary project equipment, that would avoid any significant adverse impacts.

INTRODUCTION

The construction and operation of any power plant creates noise, or unwanted sound. The character and loudness of this noise, the times of day or night that it is produced, and the proximity of the facility to sensitive receptors combine to determine whether the facility would meet applicable noise control laws and ordinances, and whether it would cause significant adverse environmental impacts. In some cases, vibration may be produced as a result of power plant construction practices, such as blasting or pile driving. The ground-borne energy of vibration has the potential to cause structural damage and annoyance.

The purpose of this analysis is to identify and examine the likely noise and vibration impacts from the construction and operation of the San Francisco Electric Reliability Project (SFERP), and to recommend procedures to ensure that the resulting noise and vibration impacts would be adequately mitigated to comply with applicable laws, ordinances, regulations and standards (LORS). For an explanation of technical terms employed in this section, please refer to **NOISE Appendix A** immediately following.

LAWS, ORDINANCES, REGULATIONS, AND STANDARDS

NOISE Table 1
Laws, Ordinances, Regulations and Standards

Applicable Law	Description
Federal (OSHA): 29 U.S.C. § 651 et seq.	**Protects workers from the effects of occupational noise exposure**
State (Cal-OSHA): Cal. Code Regs., tit. 8, §§ 5095-5099	**Protects workers from the effects of occupational noise exposure**
Local: San Francisco Police Code, Article 29, §§ 2901, 2907-2909	**Limits noise emissions from construction and from continuous noise sources**

FEDERAL

Under the Occupational Safety and Health Act of 1970 (OSHA) (29 U.S.C. § 651 et seq.), the Department of Labor, Occupational Safety and Health Administration (OSHA) has adopted regulations (29 C.F.R. § 1910.95) designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise exposure levels as a function of the amount of time during which the worker is exposed (see **NOISE Appendix A, Table A4** immediately following this section). The regulations further specify a hearing conservation program that involves monitoring the noise to which workers are exposed, assuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.

There are no federal laws governing off-site (community) noise.

The Federal Transit Administration (FTA) has published guidelines for assessing the impacts of ground-borne vibration associated with construction of rail projects, which have been applied by other jurisdictions to other types of projects. The FTA-recommended vibration standards are expressed in terms of the "vibration level," which is calculated from the peak particle velocity measured from ground-borne vibration. The FTA measure of the threshold of perception is 65 VdB, which correlates to a peak particle velocity of about 0.002 inches per second (in/sec). The FTA measure of the threshold of architectural damage for conventional sensitive structures is 100 VdB, which correlates to a peak particle velocity of about 0.2 in/sec.

STATE

California Government Code section 65302(f) encourages each local governmental entity to perform noise studies and implement a noise element as part of its General Plan. In addition, the California Office of Planning and Research has published guidelines for preparing noise elements, which include recommendations for evaluating the compatibility of various land uses as a function of community noise exposure.

The State of California, Office of Noise Control, prepared a Model Community Noise Control Ordinance, which provides guidance for acceptable noise levels in the absence of local noise standards. The Model also contains a definition of a simple tone, or "pure tone," in terms of one-third octave band sound pressure levels that can be used to determine whether a noise source contains annoying tonal components. The Model Community Noise Control Ordinance further recommends that, when a pure tone is present, the applicable noise standard should be lowered (made more stringent) by five dBA.

The California Occupational Safety and Health Administration (Cal-OSHA) has promulgated Occupational Noise Exposure Regulations (Cal. Code Regs., tit. 8, §§ 5095-5099) that set employee noise exposure limits. These standards are equivalent to the federal OSHA standards (see **NOISE Appendix A, Table A4**).

LOCAL

Article 29 of the San Francisco Police Code, entitled Regulation of Noise, is the local ordinance that regulates noise created by construction and operation of a project such as the SFERP (CITYSF 2004a).

Construction Noise

Section 2907(b) of Article 29 limits the noise from construction equipment to 80 dBA measured at a distance of 100 feet. Impact tools and equipment need not meet this limit, but must be equipped with available intake and exhaust mufflers. In addition, pavement breakers and jackhammers must be equipped with acoustical shields or shrouds.

Section 2908 limits noisy construction work, i.e., noise that exceeds the ambient noise level by 5 dBA or more at the nearest property line, to the hours between 7:00 a.m. and 8:00 p.m., unless a special permit has been issued by the City Director of Public Works.

Operational Noise

Section 2901.11 of Article 29 sets a criterion whereby any noise that exceeds the ambient noise level by 5 dBA or more, measured at the nearest property line, is considered excessive or offensive, and a violation of the Code. Section 2903 prohibits the creation of any such excessive or offensive noise where it can affect any hospital, or can affect any school or church while that facility is in use.

Section 2909(a) establishes limits for the noise that can be caused at the property line of a district based upon its zoning. Of interest in this case are the following limits:

NOISE Table 2
Operational Noise Limits Based on Zoning District

Noise Limit (dBA)		
Zoning District	Time Period	
	7 a.m. to 10 p.m.	10 p.m. to 7 a.m.
RM-1, RM-2	55	50
M-2	**75**	**75**

Source: CITYSF 2004a, section 2909(a)

SETTING

The project site lies in an industrialized neighborhood that is zoned M-2, Heavy Industry (see **NOISE Figure 1**). The nearest sensitive noise receptors are dwelling units and offices in a 21-unit building at the corner of Minnesota and 25th Streets, approximately 1,600 feet west of the project site in an area zoned M2, referred to as Location R1 (see **NOISE Figure 2**) (SFPUC 2005a, Amendment A, §§ 1.3, 8.5.4; Fig. 8.5-1; SFERP 2005n, Data Response 181). Other sensitive noise receptors include a row of residences along Tubbs Street, approximately 2,100 feet northwest of the site, and a work/live loft building on the SW corner of 23rd and Minnesota Streets, approximately 2,200 feet from the project site in the M-2 zone. Both the loft building and the residences along Tubbs Street are shielded from power plant noise by intervening buildings. Other sensitive receptors are residences on Potrero Hill to the west, over

2,700 feet from the project site in an area zoned RM-2, Mixed House and Apartment Character District (SFERP 2004a, AFC § 8.5.4; Figures 8.4-3, 8.5-1). The area surrounding the project site is fairly noisy, due to freeway and surface street traffic, marine activities, airplane overflights, and the sounds of commerce.

A feature of the project would be three variable-speed water pumps to supply wastewater to the project site for treatment and subsequent use in plant cooling. These pumps would be installed in an underground vault near Marin Street and Cesar Chavez Avenue (SFERP 2004a, AFC §§ 1.2, 2.1, 7.2.1, 10.2.3).

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires that significant environmental impacts be identified and that such impacts be eliminated or mitigated to the extent feasible. Section XI of Appendix G of CEQA Guidelines (Cal. Code Regs., tit. 14, App. G) sets forth some characteristics that may signify a potentially significant impact. Specifically, a significant effect from noise may exist if a project would result in:

1. exposure of persons to, or generation of, noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies;
2. exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
3. substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; or
4. substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

The Energy Commission staff, in applying item 3 above to the analysis of this and other projects, has concluded that a potential for a significant noise impact exists where the noise of the project plus the background exceeds the background by 5 dBA L_{90} or more at the nearest sensitive receptor.

Staff considers it reasonable to assume that an increase in background noise levels up to 5 dBA in a residential setting is insignificant; an increase of more than 10 dBA is clearly significant. An increase between 5 and 10 dBA should be considered adverse, but may be either significant or insignificant, depending on the particular circumstances of a case.

Factors to be considered in determining the significance of an adverse impact as defined above include:

1. the resulting noise level [1];
2. the duration and frequency of the noise;
3. the number of people affected;
4. the land use designation of the affected receptor sites; and
5. public concern or controversy as demonstrated at workshops or hearings, or by correspondence.

Noise due to construction activities is usually considered to be insignificant in terms of CEQA compliance if:

- the construction activity is temporary;
- use of heavy equipment and noisy activities is limited to daytime hours; and
- all industry-standard noise abatement measures are implemented for noise-producing equipment.

Ambient Noise Monitoring

In order to establish a baseline for comparison of predicted project noise to existing ambient noise, the applicant has presented the results of an ambient noise survey (SFERP 2004a, AFC § 8.5.4.1; Tables 8.5-5, 8.5-6, 8.5-7). This survey was performed in August and October, 1999, by the applicant for the Potrero Power Plant Unit 7 Project (00-AFC-4). The SFERP is to be constructed on a site approximately 1,500 feet south of the Potrero Unit 7 project; its noise impact on its surroundings will be very similar to the previously proposed project on the Potrero property. Further, little has changed in the noise regime near the project site, so this survey remains valid. The live/work lofts that were under construction during the original ambient noise survey have been completed; they appear here as the residential receptor at ML-1 (Measuring Location 1).

Long-term (25 consecutive hours) noise measurements were recorded at the live/work lofts at the southwest corner of 23rd and Minnesota Streets, referred to as ML-1. Short-term (one hour) measurements were taken at various times throughout the day and night at ML-1, and at three other locations (refer to **NOISE Figure 1**):

- ML-2: Southern boundary of the Potrero Power Plant site.
- ML-3: Western boundary of the Potrero Power Plant site, adjacent to the electrical substation.
- ML-4: On a hillside in a residential district on Potrero Hill, near the intersection of 22nd and Missouri Streets, west of Interstate Highway 280.

The applicant performed additional ambient noise monitoring on February 22 and 23, 2005, at ML-5, located at the Army Street Mini Storage on Cesar Chavez and Indiana

[1] For example, a noise level of 40 dBA would be considered quiet in many locations. A noise limit of 40 dBA would be consistent with the recommendations of the California Model Community Noise Control Ordinance for rural environments, and with industrial noise regulations adopted by European jurisdictions. If the project would create an increase in ambient noise no greater than 10 dBA at nearby sensitive receptors, and the resulting noise level would be 40 dBA or less, the project noise level would likely be insignificant.

Streets. This provides a measure of the ambient noise regime at the dwelling units at the corner of Minnesota and 25th Streets, referred to as R1, which represent the nearest residential receptors (SFPUC 2005a, Amendment A, § 8.5.4.1; Table 8.5-8).

The ambient noise monitoring surveys recorded L_{eq} (energy average) and L_{90} (background) noise levels. These figures are summarized in **NOISE Table 3**:

NOISE Table 3:
Ambient Noise Survey Results

Measuring Location	Noise Level (dBA)	
	L_{eq}	L_{90}
ML-1: Live/work Lofts, 23rd & Minnesota Streets	65 (daytime)[1] 57 (nighttime)[2]	**59 (daytime)[1]** **49 (nighttime)[2]**
ML-2: Southern Property Boundary	64 (daytime)	**56 (daytime)**
ML-3: Western Property Boundary	62 (daytime)	**59 (daytime)**
ML-4: Potrero Hill Neighborhood	55 (daytime) 50 (nighttime)	**53 (daytime)** **47 (nighttime)**
ML-5: Army Street Mini Storage	**68 (daytime)** **59 (nighttime)**	**66 (daytime)** **53 (nighttime)**

Source: SFERP 2004a, AFC Tables 8.5-5, 8.5-6, 8.5-7; SFPUC 2005a, Amendment A, Table 8.5-8
[1] Staff calculation, average of four quietest consecutive hours of the daytime (up to 8 p.m., the limit of noisy construction work)
[2] Staff calculation, average of four quietest consecutive hours of the nighttime

DIRECT IMPACTS AND MITIGATION

Noise impacts associated with the project can be created by short-term construction activities, and by normal long-term operation of the power plant.

Construction Impacts and Mitigation

Construction noise is usually considered a temporary phenomenon. Construction of the SFERP is expected to last approximately 12 months (SFPUC 2005a, Amendment A, § 2.2.14).

Compliance with LORS

Construction of an industrial facility such as a power plant is typically noisier than permissible under usual noise ordinances. In order to allow the construction of new facilities, construction noise during certain hours of the day is commonly exempt from enforcement by local ordinances. However, the City of San Francisco Police Code, Article 29 specifically addresses construction noise, limiting both the loudness and the time of day of construction noise:

- Section 2907(b) of Article 29 limits the loudness of noise from construction equipment to 80 dBA measured at a distance of 100 feet. Impact tools, pavement breakers and jackhammers must be equipped with available mufflers, acoustical shields or shrouds.

- Section 2908 limits the time of day during which noisy construction work may occur. Noise that exceeds the ambient noise level by 5 dBA or more at the nearest property

line may only be performed during the hours between 7:00 a.m. and 8:00 p.m., unless a special permit has been issued by the City Director of Public Works.

The applicant has predicted construction noise levels; they are summarized here in **NOISE Table 4**. Note that, while the applicant provided estimates at distances of 375 and 1,500 feet, staff has translated these figures into predicted noise levels at 100 feet (for compliance with § 2907(b) of the Police Code) and 1,600 feet (the nearest sensitive receptor):

NOISE Table 4
Predicted Construction Noise Levels

Receptor/Distance	**Highest Noise Level (dBA L_{eq})**
100 feet	**82**
ML-5 (1,600 feet)	**58**

Source: SFERP 2004a, AFC Table 8.5-9; SFPUC 2005a, Amendment A, Table 8.5-10; and staff calculations

While **NOISE Table 4** shows that construction noise, measured at 100 feet, could exceed the limit in Section 2907(b) by 2 dBA, this table represents a rough and very conservative estimate. As noted by the applicant (SFERP 2004a, AFC § 8.5.5.2.2, p. 8.5-9), the source figures used to produce this estimate are from studies conducted 33 years ago. Construction equipment has grown noticeably quieter in the intervening years; staff thus believes that actual construction noise will, in fact, comply with Section 2908, that is, a limit of 80 dBA at 100 feet. In the event that actual construction noise should exceed this limit and annoy nearby workers or residents, staff proposes Conditions of Certification **NOISE-1** and **NOISE-2**, which would establish a Noise Complaint Process that requires the applicant to resolve any problems caused by construction noise.

The applicant commits to performing noisy construction work during daytime hours, that is, 7 a.m. to 8 p.m., unless a special permit is issued by the City Director of Public Works (SFERP 2004a, AFC § 8.5.5.2.2, p. 8.5-10; § 8.5.6.3: SFPUC 2005a, Amendment A, § 8.5.5.2.2, p. 8.5-11; § 8.5.6.3). This would satisfy the requirement of Section 2908. To ensure that these hours are, in fact, adhered to, staff proposes Condition of Certification **NOISE-6**.

The applicant has stated that pile driving is anticipated (SFPUC 2005a, Amendment A, § 8.5.5.2.3). Pile driving would be performed in compliance with the applicable LORS. Section 2907(b) of the Police Code requires that impact tools be equipped with applicable mufflers and shrouds. Section 2908 of the Code limits such noisy work to the daytime hours. Staff believes that pile driving would be performed in compliance with applicable LORS.

CEQA Impacts

Since construction noise typically varies continually with time, it is most appropriately measured by, and compared to, the L_{eq} (energy average) metric. As seen in **NOISE Table 4** above, construction noise at the nearest sensitive receptor, the dwelling units at R-1 (represented by ML-5), may reach 58 dBA. The ambient daytime L_{eq} level at ML-5, as seen in **NOISE Table 3** above, is 68 dBA. The addition of construction noise to the ambient would not increase the ambient level at all. In fact, construction noise at R-1

should be practically unnoticeable. Construction noise should not create an adverse impact at R-1, the nearest sensitive receptor.

Construction noise at the Potrero Hill neighborhood, represented by ML-4, would be quieter than at ML-5 due to its greater distance from the project site. The distance from the site to ML-4 is greater than 2,700 feet,[2] compared to 1,600 feet from the site to ML-5. This would yield construction noise levels at ML-4 lower than 54 dBA, lower than the daytime L_{eq} at ML-4 of 55 dBA (**NOISE Table 3**, above). Combining these yields 57 dBA, an increase of 2 dB. Such an increase is typically barely noticeable, and unlikely to cause annoyance. Staff thus concludes that project construction will create no significant adverse impacts at ML-4. To ensure this, staff proposes Conditions of Certification **NOISE-1** and **NOISE-2**, which would establish a Noise Complaint Process to resolve any complaints regarding construction noise.

Linear Facilities

New off-site linear facilities would include a 0.7-mile long sanitary effluent supply pipeline to supply project water needs, a 900-foot long, 12-inch diameter natural gas pipeline from the existing PG&E load center, a sanitary wastewater discharge line to the City's combined sewer system, and an underground 115 kV transmission line to the existing Potrero substation (SFPUC 2005a, Amendment A, § 2.1). Approximately 1,300 feet of the 0.7-mile long wastewater supply line will be installed in an existing underground collection box; the remainder will be new construction that follows Cesar Chavez Avenue to the site. The three variable-speed water pumps that supply this wastewater will be installed in an existing below-ground combined sewer system structure (SFERP 2004a, AFC § 2.1, Figure 2-1).

Construction of linear facilities typically moves along at a rapid pace, thus not subjecting any one receptor to noise impacts for more than two or three days. Section 2907(b) of the Police Code limits the noise that may be produced by construction equipment to 80 dBA at 100 feet, and requires impact tools such as jackhammers to be muffled and shrouded. Further, Section 2908 of the Police Code limits the hours of noisy construction work to 7 a.m. until 8 p.m. With these restrictions, staff believes that construction of the project linears will create noise impacts that are less than significant.

To ensure compliance with these restrictions, staff proposes Condition of Certification **NOISE-6**.

Vibration

The only construction operation likely to produce vibration that could be perceived off-site would be pile driving. The applicant anticipates that pile driving will be required for construction of the SFERP (SFPUC 2005a, Amendment A, § 8.5.5.2.3). The nearest sensitive receptors are 1,600 feet (0.3 mile) distant at R-1. It is highly unlikely that vibration from pile driving could produce significant impacts at that distance.

Pile Driving

Pile driving noise is predicted to reach 74 dBA at a distance of 1,500 feet (SFPUC 2005a, Amendment A, Table 8.5-11); correcting this for the distance to the nearest

[2] Staff calculation, scaled from SFERP 2004a, AFC Figure 1-2.

residential receptors at R1, a distance of 1,600 feet, yields noise levels of approximately 71 dBA. This is substantially below the limit of 80 dBA specified in Section 2907(b) of the Police Code. Further, the applicant commits to performing pile driving during daytime hours, to comply with Section 2908 of the Police Code. To ensure that pile driving will take place during the daytime, staff proposes Condition of Certification **NOISE-6**.

Worker Effects

The applicant has acknowledged the need to protect construction workers from noise hazards, and has recognized those applicable LORS that would protect construction workers (SFERP 2004a, AFC Table 8.5-3; §§ 8.5.3.1.2, 8.5.3.2.1, 8.5.5.2.1; SFPUC 2005a, Amendment A, § 8.5.5.2.1). To ensure that construction workers are, in fact, adequately protected, staff has proposed Condition of Certification **NOISE-3**.

Operation Impacts and Mitigation

The primary noise sources of the SFERP include the gas turbine generators, gas turbine air inlets, exhaust stacks, natural gas fuel compressors, electrical transformers, and various pumps and fans. Staff compares the projected project noise with applicable LORS, in this case, the Police Code. In addition, staff evaluates any increase in noise levels at sensitive receptors due to the project in order to identify any significant adverse impacts.

Proposed noise mitigation measures include the following equipment for each of the three gas turbine generator units (SFERP 2004a, AFC §§ 2.2.4, 8.5.5.3.6):

- metal acoustical enclosure;
- inlet air filter/chiller;
- selective catalytic reduction unit; and
- exhaust stack silencer.

In addition, the applicant plans to avoid the creation of annoying tonal (pure-tone) noises by balancing the noise emissions of various power plant features during plant design (SFERP 2004a, AFC § 8.5.5.3.5).

Note that landscaping will not be relied upon to provide noise attenuation. While a dense forest can muffle sound, the landscaping possible around an industrial site such as the SFERP typically offers no measurable benefit.

Compliance with LORS

The applicant performed noise modeling to determine the project's noise impacts on sensitive receptors (SFPUC 2005a, Amendment A, § 8.5.5.3.4). Project operating noise at ML-1 (the live/work loft building) and at R-1 (the nearest residences) is projected to be less than 54 dBA L_{eq}; operating noise at ML-4 (the Potrero Hill neighborhood) would not exceed 47 dBA L_{eq}.

Section 2901.11 of the Police Code prohibits noise that exceeds the ambient, at the receiving property line, by 5 dBA or more. This LORS requires comparison with the ambient L_{eq} level. As seen in **NOISE Table 3** above, nighttime L_{eq} levels at ML-1, ML-4

and ML-5 (representing the dwellings at R1, those nearest the project site) are lower than daytime levels, so staff compares projected power plant noise to these nighttime levels:

NOISE Table 5
Comparison of Nighttime L_{eq} Levels

Receptor	Nighttime Ambient Level, dBA L_{eq}	Power Plant Noise Level, dBA L_{eq}	**Exceedance, dBA**
ML-1: Live/Work Lofts	57	54	**-3**
ML-4: Potrero Hill Neighborhood	50	47	**-3**
ML-5: Army Street Mini Storage	**59**	**54**	**-5**

As seen in **NOISE Table 5**, power plant noise is predicted to be less than the ambient level at ML-1, ML-4 and ML-5. The project would thus comply with Section 2901.11 of the Police Code.

Section 2909(a) of the Police Code limits the noise that can be caused at the property line of a receptor in certain zoning districts. ML-1 and ML-5 lie in a district zoned M-2, Heavy Industry, while ML-4 and the Potrero Hill neighborhood lie in a district zoned RM-2, Mixed House and Apartment Character District (SFERP 2004a, AFC Figure 8.4-3). As seen in **NOISE Table 2** above, the permissible noise limits are:

NOISE Table 6
Noise Comparison Based on Zoning District

Receptor	Zoning District	Power Plant Noise Level dBA L_{eq}	Noise Limit dBA		**Exceedance dBA**	
			Daytime 7a.m.-10p.m.	Nighttime 10p.m.-7a.m.	Day-time	**Night-time**
ML-1, ML-5	M-2	54	75	75	-21	**-21**
ML-4	**RM-2**	**47**	**55**	**50**	**-8**	**-3**

As seen in **NOISE Table 6**, the project will not exceed the prescribed limits at either ML-1, the live/work loft building, ML-5, near the dwellings at R1, or ML-4, the Potrero Hill neighborhood. The project would thus comply with Section 2909(a) of the Police Code. To ensure compliance, staff has proposed Condition of Certification **NOISE-4**.

CEQA Impacts

Power plant noise is unique. A power plant operates as, essentially, a steady, continuous, broadband noise source, unlike the intermittent sounds that comprise the majority of the noise environment. As such, power plant noise contributes to, and becomes part of, the background noise level, or the sound heard when most intermittent noises cease. Where power plant noise is audible, it will tend to define the background noise level. For this reason, staff compares the projected power plant noise to the existing ambient background (L_{90}) noise levels at the affected sensitive receptors. If this comparison identifies a significant adverse impact, then feasible mitigation must be incorporated in the project to reduce or remove the impact.

In most cases, a power plant will be intended to operate around the clock for much of the year. Staff evaluates project noise emissions by comparing them to the nighttime ambient background level; this assumes the potential for annoyance due to power plant noise is greatest at night when residents are trying to sleep. Nighttime ambient noise levels are typically lower than the daytime levels; differences in background noise levels of 5 to 10 dBA are common. Staff believes it is prudent to average the lowest nighttime hourly background noise level values to arrive at a reasonable baseline for comparison with the project's predicted noise level.

Adverse impacts, as defined in CEQA, can be detected by comparing predicted power plant noise levels to the ambient nighttime background noise levels at the nearest sensitive receptors, as shown in **NOISE Table 7**:

NOISE Table 7
Noise Impacts at Nearest Sensitive Receptors

Receptor	Ambient Noise Level (dBA L_{90})[1]	Power Plant Noise Level (dBA L_{eq})[2]	Resultant Noise Level (dBA)	**Change (dBA)**
ML-1: Live/Work Lofts	49	54	55	**+6**
ML-4: Potrero Hill Neighborhood	47	47	50	**+3**
ML-5: Army Street Mini Storage	**53**	**54**	**57**	**+4**

[1] Source: SFERP 2004a, AFC Table 8.5-6; SFPUC 2005a, Amendment A, Table 8.5-8; and staff calculation, average of four quietest consecutive hours of the nighttime
[2] Source: SFERP 2004a. AFC Table 8.5-5, 8.5-7; SFPUC 2005a, Amendment A, § 8.5.5.3.4, Table 8.5-8

The increase in noise at ML-1, the live/work lofts, as seen in **NOISE Table 7**, would be approximately 6 dBA. As described above (under Method and Threshold for Determining Significance), staff regards an increase of up to 5 dBA as a clearly less than significant impact, and an increase of more than 10 dBA as a clearly significant impact. An increase of 6 dBA, in a relatively noisy neighborhood such as that encompassing ML-1, would typically represent a less than significant impact. Further influencing this conclusion is the fact that the land at ML-1 is zoned M-2, Heavy Industry. Staff therefore believes that an increase of 6 dBA amounts to a less than significant impact.

The increase in noise at R-1, the nearest residences (represented by ML-5), would be approximately 4 dBA. Such an increase is barely noticeable. Additionally, these residences lie on land zoned M-2, Heavy Industry. Such an increase is clearly an insignificant impact.

The increase in noise at ML-4, the Potrero Hill neighborhood, would be approximately 3 dBA. Such an increase is barely detectable, and clearly constitutes a less than significant impact.

Staff therefore concludes that the power plant operating noise would not pose a significant adverse impact on any sensitive receptors.

Tonal Noises

One possible source of annoyance would be strong tonal noises. Tonal noises are individual sounds (such as pure tones) that, while not louder than permissible levels, stand out in sound quality. The applicant plans to address overall noise in design, and to take appropriate measures, as necessary, to eliminate tonal noises as possible sources of annoyance (SFERP 2004a, AFC § 8.5.5.3.5; SFPUC 2005a, Amendment A, § 8.5.5.3.5). To ensure that tonals do not cause annoyance, staff proposes Condition of Certification **NOISE-4**.

Linear Facilities

All water and gas piping will lie underground, and will be silent during operation. Noise effects from the electrical interconnection line typically do not extend beyond the right-of-way easement of the line, and will thus be inaudible to any receptors.

Water Supply Pumping Station

The three variable-speed water pumps that would supply wastewater to the project site for plant cooling would be located near Marin Street and Cesar Chavez Avenue (SFERP 2004a, AFC §§ 1.2, 2.1, 7.2.1, 10.2.3). These pumps would be installed in an underground vault, and would be inaudible to any receptors (SFERP 2004a, AFC § 8.5.5.3.3; SFERP 2004q, Data Response 41).

Vibration

Vibration from an operating power plant could be transmitted by two chief means; through the ground (groundborne vibration), and through the air (airborne vibration).

The operating components of a simple cycle power plant consist of high-speed gas turbines, compressors, and various pumps. All of these pieces of equipment must be carefully balanced in order to operate; permanent vibration sensors are attached to the turbines and generators. The applicant explains that it is unlikely that any vibration would be felt beyond the equipment (SFERP 2004a, AFC § 8.5.5.3.6). Energy Commission staff agrees with this estimate, and agrees with the applicant that groundborne vibration from the SFERP will be undetectable by any likely receptor.

Airborne vibration (low frequency noise) can rattle windows and objects on shelves, and can rattle the walls of lightweight structures. The SFERP's chief source of airborne vibration would be the gas turbines' exhaust. In a power plant such as the SFERP, however, the exhaust must pass through the selective catalytic reduction (SCR) modules and the stack silencers before it reaches the atmosphere. The SCRs act as efficient mufflers; the combination of SCR units and stack silencers makes it highly unlikely that the SFERP would cause perceptible airborne vibration effects.

Worker Effects

The applicant has acknowledged the need to protect plant operating and maintenance workers from noise hazards, and has committed to comply with applicable LORS (SFERP 2004a, AFC § 8.5.5.3.1; SFPUC 2005a, Amendment A, § 8.5.5.3.1). Signs would be posted in areas of the plant with noise levels exceeding 85 dBA (the level that OSHA recognizes as a threat to workers' hearing), and hearing protection would be required. To ensure that plant operation and maintenance workers are, in fact,

adequately protected, Energy Commission staff has proposed condition of certification **NOISE-5**.

CUMULATIVE IMPACTS AND MITIGATION

The only other noise sources of which staff is aware that are near enough to the SFERP to hold the potential for significant cumulative noise impacts are (see the **Land Use** portion of this document):

- **Pier 70**. While industrial and commercial development is forecast for this area north of the SFERP site, there is no specific schedule for that development. Construction is expected to last five years or so.
- **MUNI Metro East Light Rail Maintenance and Operations Facility**. Nearly a quarter mile south of the SFERP site, it would be highly unusual for the noise from these two widely separated projects to combine to produce significant cumulative impacts.

A power plant such as the SFERP would fit into this industrial neighborhood; the quality and loudness of its noise emanations would tend to blend with the overall noise regime in its neighborhood. Since the project is expected to comply with all applicable noise LORS, and to present no significant direct impacts, staff deems it highly unlikely that the SFERP would produce significant cumulative noise impacts.

FACILITY CLOSURE

In the future, upon closure of the SFERP, all operational noise from the project would cease, and no further adverse noise impacts from operation of the SFERP would be possible. The remaining potential temporary noise source is the dismantling of the structures and equipment, and any site restoration work that may be performed. Since this noise would be similar to that caused by the original construction, it can be treated similarly. That is, noisy work could be performed during daytime hours, with machinery and equipment properly equipped with mufflers. Any noise LORS that were in existence at that time would apply. Applicable conditions of certification included in the Energy Commission decision would also apply unless modified.

CONCLUSIONS

The SFERP, if built and operated in conformance with the proposed conditions of certification below, would comply with all applicable noise and vibration LORS, and would produce no significant adverse noise impacts, either direct or cumulative. While a power plant such as the SFERP could be designed and built to produce unacceptable noise impacts, the applicant has proposed appropriate mitigation, in the form of good design practice and inclusion of necessary project equipment, that would avoid any such impacts.

PROPOSED CONDITIONS OF CERTIFICATION

NOISE-1 At least 15 days prior to the start of ground disturbance, the project owner shall notify all residents within one-half mile of the site and the linear

facilities, by mail or other effective means, of the commencement of project construction. At the same time, the project owner shall establish a telephone number for use by the public to report any undesirable noise conditions associated with the construction and operation of the project. If the telephone is not staffed 24 hours per day, the project owner shall include an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. This telephone number shall be posted at the project site during construction in a manner visible to passersby. This telephone number shall be maintained until the project has been operational for at least one year.

Verification: Prior to ground disturbance, the project owner shall transmit to the Compliance Project Manager (CPM) a statement, signed by the project owner's project manager, stating that the above notification has been performed, and describing the method of that notification, verifying that the telephone number has been established and posted at the site, and giving that telephone number.

NOISE COMPLAINT PROCESS

NOISE-2 Throughout the construction and operation of the project, the project owner shall document, investigate, evaluate, and attempt to resolve all project-related noise complaints. The project owner or authorized agent shall:

- Use the Noise Complaint Resolution Form (below), or a functionally equivalent procedure acceptable to the CPM, to document and respond to each noise complaint;
- Attempt to contact the person(s) making the noise complaint within 24 hours;
- Conduct an investigation to determine the source of noise related to the complaint;
- If the noise is project related, take all feasible measures to reduce the noise at its source; and
- Submit a report documenting the complaint and the actions taken. The report shall include: a complaint summary, including final results of noise reduction efforts; and if obtainable, a signed statement by the complainant stating that the noise problem is resolved to the complainant's satisfaction.

Verification: Within five days of receiving a noise complaint, the project owner shall file a copy of the Noise Complaint Resolution Form, with the local jurisdiction and the CPM, documenting the resolution of the complaint. If mitigation is required to resolve a complaint, and the complaint is not resolved within a 3-day period, the project owner shall submit an updated Noise Complaint Resolution Form when the mitigation is implemented.

NOISE-3 The project owner shall submit to the CPM for review and approval a noise control program. The noise control program shall be used to reduce employee exposure to high noise levels during construction and also to comply with applicable OSHA and Cal-OSHA standards.

Verification: At least 30 days prior to the start of ground disturbance, the project owner shall submit to the CPM the noise control program. The project owner shall make the program available to Cal-OSHA upon request.

NOISE RESTRICTIONS

NOISE-4 The project design and implementation shall include appropriate noise mitigation measures adequate to ensure that operation of the project will not cause noise levels due to plant operation alone to exceed 47 dBA L_{eq} measured near the intersection of 22nd and Missouri Streets (monitoring location ML-4).

The measurement of power plant noise for the purposes of demonstrating compliance with this condition of certification may alternatively be made at a location, acceptable to the CPM, closer to the plant (e.g., 400 feet from the plant boundary) and this measured level then mathematically extrapolated to determine the plant noise contribution at the affected residence. However, notwithstanding the use of this alternative method for determining the noise level, the character of the plant noise shall be evaluated at the affected residential location (ML-4) to determine the presence of pure tones or other dominant sources of plant noise.

No new pure-tone components may be introduced. No single piece of equipment shall be allowed to stand out as a source of noise that draws legitimate complaints.

A. When the project first achieves a sustained output of 80 percent or greater of rated capacity, the project owner shall conduct a 25-hour community noise survey at monitoring site ML-4, or at a closer location acceptable to the CPM. This survey during power plant operation shall also include measurement of one-third octave band sound pressure levels to ensure that no new pure-tone noise components have been introduced.

B. If the results from the noise survey indicate that the power plant noise level (L_{eq}) at the affected receptor site exceeds the above value for any given hour during the 25-hour period, mitigation measures shall be implemented to reduce noise to a level of compliance with these limits.

C. If the results from the noise survey indicate that pure tones are present, mitigation measures shall be implemented to eliminate the pure tones.

Verification: The survey shall take place within 30 days of the project first achieving a sustained output of 80 percent or greater of rated capacity. Within 15 days after completing the survey, the project owner shall submit a summary report of the survey to the CPM. Included in the survey report will be a description of any additional mitigation measures necessary to achieve compliance with the above listed noise limits, and a schedule, subject to CPM approval, for implementing these measures. When these measures are in place, the project owner shall repeat the noise survey.

Within 15 days of completion of the new survey, the project owner shall submit to the CPM a summary report of the new noise survey, performed as described above and showing compliance with this condition.

NOISE-5 Following the project first achieving a sustained output of 80 percent or greater of rated capacity, the project owner shall conduct an occupational noise survey to identify the noise hazardous areas in the facility.

The survey shall be conducted by a qualified person in accordance with the provisions of Title 8, California Code of Regulations, sections 5095-5099 (Article 105) and Title 29, Code of Federal Regulations, section 1910.95. The survey results shall be used to determine the magnitude of employee noise exposure.

The project owner shall prepare a report of the survey results and, if necessary, identify proposed mitigation measures that will be employed to comply with the applicable California and federal regulations.

Verification: Within 30 days after completing the survey, the project owner shall submit the noise survey report to the CPM. The project owner shall make the report available to OSHA and Cal-OSHA upon request.

CONSTRUCTION TIME RESTRICTIONS

NOISE-6 Heavy equipment operation and noisy construction work relating to any project features shall be restricted to the times of day delineated below, unless a special permit has been issued by the City Director of Public Works:

Any Day	7 a.m. to 8 p.m.

Haul trucks and other engine-powered equipment shall be equipped with adequate mufflers. Haul trucks shall be operated in accordance with posted speed limits. Truck engine exhaust brake use shall be limited to emergencies.

Verification: Prior to ground disturbance, the project owner shall transmit to the CPM a statement acknowledging that the above restrictions will be observed throughout the construction of the project.

EXHIBIT 1 - NOISE COMPLAINT RESOLUTION FORM

San Francisco Electric Reliability Project
(04-AFC-1)

NOISE COMPLAINT LOG NUMBER _____

Complainant's name and address:

Phone number: _____

Date complaint received: _____
Time complaint received: _____

Nature of noise complaint:

Definition of problem after investigation by plant personnel:

Date complainant first contacted: _____

Initial noise levels at 3 feet from noise source _____ dBA Date: _____

Initial noise levels at complainant's property: _____ dBA Date: _____

Final noise levels at 3 feet from noise source: _____ dBA Date: _____

Final noise levels at complainant's property: _____ dBA Date: _____

Description of corrective measures taken:

Complainant's signature: _____ Date: _____

Approximate installed cost of corrective measures: $ _____
Date installation completed: _____
Date first letter sent to complainant: _____ (copy attached)
Date final letter sent to complainant: _____ (copy attached)

This information is certified to be correct:

Plant Manager's Signature: _____

(Attach additional pages and supporting documentation, as required).

REFERENCES

CITYSF2004a — City of San Francisco Police Code, Article 29, Regulation of Noise. June 21, 2004.

SFERP2004a — City and County of San Francisco/Blount (tn: 31130). Application for Certification, San Francisco Electric Reliability Project — 145 megawatt natural gas-fired peaking power plant located in San Francisco. Submitted to CEC/Therkelsen/Dockets on 3/18/04.

SFERP2004q — CH2MHill/Carrier (tn: 31854). Data Responses Set 1A. Response to Staff's Data Requests dated 6/4/04. Submitted to CEC/Pfanner/Dockets on 7/6/04.

SFPUC2005a — San Francisco Public Utilities Commission/Hale (tn: 34403). Amendment A of the Application for Certification. Submitted to CEC/Therkelsen/Dockets on 3/25/05.

SFERP 2005n — CH2MHill/Carrier (tn: 34542). Data Response Set 3A. Submitted to CEC/Pfanner/Dockets on 6/3/05.

NOISE APPENDIX A
FUNDAMENTAL CONCEPTS OF COMMUNITY NOISE

To describe noise environments and to assess impacts on noise sensitive area, a frequency weighting measure, which simulates human perception, is customarily used. It has been found that A-weighting of sound intensities best reflects the human ear's reduced sensitivity to low frequencies and correlates well with human perceptions of the annoying aspects of noise. The A-weighted decibel scale (dBA) is cited in most noise criteria. Decibels are logarithmic units that conveniently compare the wide range of sound intensities to which the human ear is sensitive. **Noise Table A1** provides a description of technical terms related to noise.

Noise environments and consequences of human activities are usually well represented by an equivalent A-weighted sound level over a given time period (L_{eq}), or by average day and night A-weighted sound levels with a nighttime weighting of 10 dBA (L_{dn}). Noise levels are generally considered low when ambient levels are below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. Outdoor day-night sound levels vary over 50 dBA depending on the specific type of land use. Typical L_{dn} values might be 35 dBA for a wilderness area, 50 dBA for a small town or wooded residential area, 65 to 75 dBA for a major metropolis downtown (e.g., San Francisco), and 80 to 85 dBA near a freeway or airport. Although people often accept the higher levels associated with very noisy urban residential and residential-commercial zones, they nevertheless are considered to be levels of noise adverse to public health.

Various environments can be characterized by noise levels that are generally considered acceptable or unacceptable. Lower levels are expected in rural or suburban areas than what would be expected for commercial or industrial zones. Nighttime ambient levels in urban environments are about seven decibels lower than the corresponding average daytime levels. The day-to-night difference in rural areas away from roads and other human activity can be considerably less. Areas with full-time human occupation that are subject to nighttime noise, which does not decrease relative to daytime levels, are often considered objectionable. Noise levels above 45 dBA at night can result in the onset of sleep interference effects. At 70 dBA, sleep interference effects become considerable (Effects of Noise on People, U.S. Environmental Protection Agency, December 31,1971).

In order to help the reader understand the concept of noise in decibels (dBA), **Noise Table A2** has been provided to illustrate common noises and their associated sound levels, in dBA.

Noise Table A1 Definition of Some Technical Terms Related to Noise	
Terms	**Definitions**
Decibel, dB	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals (20 micronewtons per square meter).
Frequency, Hz	The number of complete pressure fluctuations per second above and below atmospheric pressure.
A-Weighted Sound Level, dBA	The sound pressure level in decibels as measured on a Sound Level Meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. All sound levels in this testimony are A-weighted.
L_{10}, L_{50}, & L_{90}	The A-weighted noise levels that are exceeded 10%, 50%, and 90% of the time, respectively, during the measurement period. L_{90} is generally taken as the background noise level.
Equivalent Noise Level, L_{eq}	The energy average A-weighted noise level during the Noise Level measurement period.
Community Noise Equivalent Level, CNEL	The average A-weighted noise level during a 24-hour day, obtained after addition of 4.8 decibels to levels in the evening from 7 p.m. to 10 p.m., and after addition of 10 decibels to sound levels in the night between 10 p.m. and 7 a.m.
Day-Night Level, L_{dn} or DNL	The Average A-weighted noise level during a 24-hour day, obtained after addition of 10 decibels to levels measured in the night between 10 p.m. and 7 a.m.
Ambient Noise Level	The composite of noise from all sources, near and far. The normal or existing level of environmental noise at a given location.
Intrusive Noise	That noise that intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.
Pure Tone	A pure tone is defined by the Model Community Noise Control Ordinance as existing if the one-third octave band sound pressure level in the band with the tone exceeds the arithmetic average of the two contiguous bands by 5 decibels (dB) for center frequencies of 500 Hz and above, or by 8 dB for center frequencies between 160 Hz and 400 Hz, or by 15 dB for center frequencies less than or equal to 125 Hz.

Source: Guidelines for the Preparation and Content of Noise Elements of the General Plan, Model Community Noise Control Ordinance, California Department of Health Services 1976, 1977.

Noise Table A2 Typical Environmental and Industry Sound Levels			
Noise Source (at distance)	A-Weighted Sound Level in Decibels (dBA)	Noise Environment	Subjective Impression
Civil Defense Siren (100')	140-130		Pain Threshold
Jet Takeoff (200')	120		Very Loud
Very Loud Music	110	Rock Music Concert	
Pile Driver (50')	100		
Ambulance Siren (100')	90	Boiler Room	
Freight Cars (50')	85		
Pneumatic Drill (50')	80	Printing Press Kitchen with Garbage Disposal Running	Loud
Freeway (100')	70		Moderately Loud
Vacuum Cleaner (100')	60	Data Processing Center Department Store/Office	
Light Traffic (100')	50	Private Business Office	
Large Transformer (200')	40		Quiet
Soft Whisper (5')	30	Quiet Bedroom	
	20	Recording Studio	
	10		Threshold of Hearing

Source: Handbook of Noise Measurement, Arnold P.G. Peterson, 1980

Subjective Response to Noise

The adverse effects of noise on people can be classified into three general categories:

- Subjective effects of annoyance, nuisance, dissatisfaction.
- Interference with activities such as speech, sleep, and learning.
- Physiological effects such as anxiety or hearing loss.

The sound levels associated with environmental noise, in almost every case, produce effects only in the first two categories. Workers in industrial plants can experience noise effects in the last category. There is no completely satisfactory way to measure the subjective effects of noise, or of the corresponding reactions of annoyance and dissatisfaction, primarily because of the wide variation in individual tolerance of noise.

One way to determine a person's subjective reaction to a new noise is to compare the level of the existing (background) noise, to which one has become accustomed, with the level of the new noise. In general, the more the level or the tonal variations of a new noise exceed the previously existing ambient noise level or tonal quality, the less acceptable the new noise will be, as judged by the exposed individual.

With regard to increases in A-weighted noise levels, knowledge of the following relationships can be helpful in understanding the significance of human exposure to noise.

1 Except under special conditions, a change in sound level of one dB cannot be perceived.

2 Outside of the laboratory, a three dB change is considered a barely noticeable difference.

3 A change in level of at least five dB is required before any noticeable change in community response would be expected.

4 A ten dB change is subjectively heard as an approximate doubling in loudness and almost always causes an adverse community response. (Kryter, Karl D., The Effects of Noise on Man, 1970)

Combination of Sound Levels

People perceive both the level and frequency of sound in a non-linear way. A doubling of sound energy (for instance, from two identical automobiles passing simultaneously) creates a three dB increase (i.e., the resultant sound level is the sound level from a single passing automobile plus three dB). The rules for decibel addition used in community noise prediction are:

Noise Table A3
Addition of Decibel Values

When two decibel values differ by:	Add the following amount to the larger value
0 to 1 dB	3 dB
2 to 3 dB	2 dB
4 to 9 dB	1 dB
10 dB or more	0
Figures in this table are accurate to ± 1 dB.	

Source: Architectural Acoustics, M. David Egan, 1988

Sound and Distance

Doubling the distance from a noise source reduces the sound pressure level by six dB.

Increasing the distance from a noise source 10 times reduces the sound pressure level by 20 dB.

Worker Protection

OSHA noise regulations are designed to protect workers against the effects of noise exposure, and list permissible noise level exposure as a function of the amount of time to which the worker is exposed:

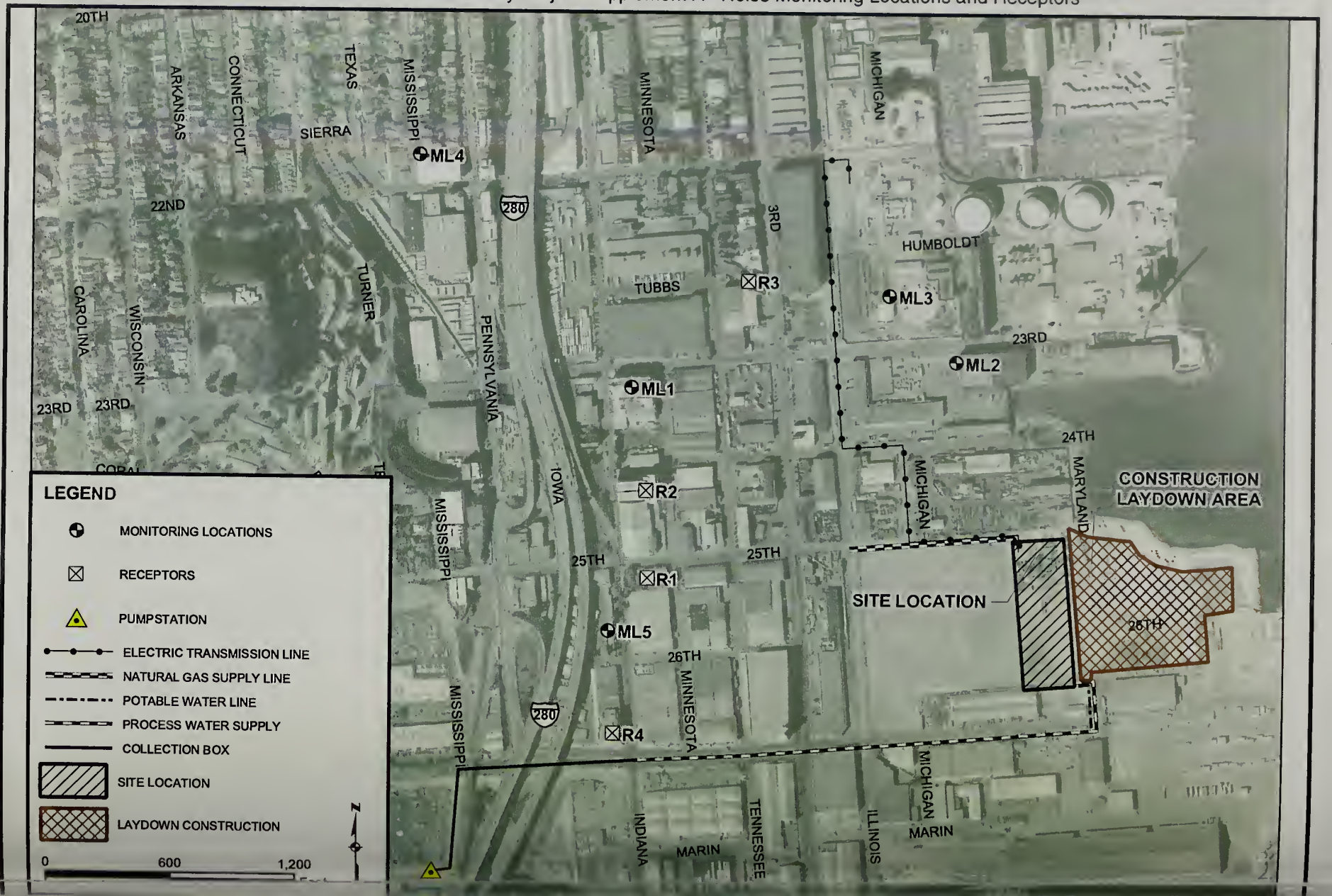
Noise Table A4
OSHA Worker Noise Exposure Standards

Duration of Noise (Hrs/day)	A-Weighted Noise Level (dBA)
8.0	90
6.0	92
4.0	95
3.0	97
2.0	100
1.5	102
1.0	105
0.5	110
0.25	115

Source: 29 C.F.R. § 1910.95

NOISE AND VIBRATION - FIGURE 1

San Francisco Electric Reliability Project Supplement A - Noise Monitoring Locations and Receptors



San Francisco Electric Reliability Project Supplement A - Receptor R1

CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE:SFERP 2005n, p.16

PUBLIC HEALTH

Alvin J. Greenberg, Ph.D.

SUMMARY OF CONCLUSIONS

Staff has analyzed potential public health risks associated with construction and operation of the San Francisco Electric Reliability Project, and does not expect there would be any significant adverse cancer, or short - or long-term noncancer health effects from project toxic emissions if the proposed conditions of certification in this section and the Air Quality section are implemented.

INTRODUCTION

The purpose of this Preliminary Staff Assessment (PSA) is to determine if toxic emissions from the proposed San Francisco Electric Reliability Project (SFERP) would have the potential to cause significant adverse public health impacts or to violate standards for public health protection. If potentially significant health impacts are identified, staff will evaluate mitigation measures to reduce such impacts to insignificant levels.

Although staff addresses potential impacts of regulated or criteria air pollutants in the **Air Quality** section of this PSA, **Public Health Appendix A** at the end of this section provides information on the health effects of such pollutants. Impacts on public and worker health from accidental releases of hazardous materials are examined in the **Hazardous Materials Management** section. Health effects from electromagnetic fields are discussed in the **Transmission Line Safety and Nuisance** section. Pollutants released from the project in wastewater streams to the public sewer system are discussed in the **Soil and Water Resources** section. Plant releases in the form of hazardous and nonhazardous wastes are described in the **Waste Management** section.

LAWS, ORDINANCES, REGULATION, AND STANDARDS

PUBLIC HEALTH Table 1
Laws, Ordinances, Regulations, and Standards (LORS)

Applicable Law	Description
Federal	
Clean Air Act section 112 (42 U.S. Code section 7412)	Requires new sources which emit more than ten tons per year of any specified hazardous air pollutant (HAP) or more than 25 tons per year of any combination of HAPs to apply Maximum Achievable Control Technology (MACT).
State	
California Health and Safety Code section 41700	This section states that "no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the

	public, or which cause, or have a natural tendency to cause injury or damage to business or property."
California Code of Regulations, Title 22, Section 60306	Requires that whenever a cooling system uses recycled water in conjunction with an air conditioning facility and a cooling tower that creates a mist that could come into contact with employees or members of the public, a drift eliminator shall be used and chlorine, or other, biocides shall be used to treat the cooling system recirculating water to minimize the growth of Legionella and other micro-organisms.
Local	
Bay Area Air Quality Management District Regulation 2, Rule 5	This rule requires a risk assessment or risk screening analysis to be performed for new or modified facilities that emit one or more toxic air contaminants.

SETTING

This section describes the environment in the vicinity of the proposed project site from the public health perspective. Features of the natural environment, such as meteorology and terrain, affect the project's potential for causing impacts on public health. An emissions plume from a facility may affect elevated areas before lower terrain areas, due to a reduced opportunity for atmospheric mixing. Consequently, areas of elevated terrain can often be subjected to increased pollutant impacts. Also, the types of land use near a site influence the surrounding population distribution and density, which, in turn, affects public exposure to project emissions. Additional factors affecting potential public health impacts include existing air quality and environmental site contamination. The surrounding neighborhoods consist mostly of Dogpatch, Potrero Hill, Bayview, and Hunters Point and include all or part of zip codes 94107 and 94124.

SITE AND VICINITY DESCRIPTION

Land uses in the vicinity of the proposed project are predominantly industrial, with residential and commercial uses located west of an industrial band of land uses along the waterfront (SFPUC 2005a Section 8.4.2.1). Currently, land at the proposed site is zoned as Heavy Industry (M-2). The natural gas pipeline proposed to be constructed for this project will be 900-feet long and will run west adjacent to 25th street from a metering station located on the western side of the project site. The land along the pipeline route is also zoned Heavy Industrial. The project will also require the installation of a 0.76-mile water pipeline to convey process water from the City's combined sewer system for recycling and use on-site. This pipeline will also be located in land zoned Heavy Industrial.

The nearest residence is located approximately 1,600 feet west of the site. There are over 500 sensitive receptors including 233 schools and day care facilities, 15 hospitals, 32 senior care facilities, 221 churches, and 57 parks and recreation centers within a 3-mile radius (SFPUC 2005a, Section 8.12.3). There also appear to be some transient residents at Warm Water Cove Park located about 700 feet northeast of the project site. The closest church is located 474 feet southwest of the project site. As mentioned

above, the location of sensitive receptors near the proposed site is an important factor in considering potential public health impacts.

The location of elevated terrain (terrain above the power plant stack height) is an important factor to be considered in assessing potential exposure. An emission plume may impact high elevations before impacting lower elevations. The SFERP stack would be 85 feet high (SFPUC 2005a Section 8.1). Terrain above stack height ranges up to 700 feet in elevation in the project vicinity, and exists in all directions except for east, where the San Francisco Bay is located (SFERP 2004d USGS Quad Maps). The site topography itself is relatively flat and is about 13.5 feet above sea level.

METEOROLOGY

Meteorological conditions, including wind speed, wind direction, and atmospheric stability, affect the extent to which pollutants are dispersed into ambient air as well as the direction of pollutant transport. This, in turn, affects the level of public exposure to emitted pollutants and associated health risks. When wind speeds are low and the atmosphere is stable, for example, dispersion is reduced and localized exposure may be increased.

Mild summers with minimal precipitation and mildly windy and rainy winters characterize the climate of San Francisco (SFPUC 2005a Section 8.1.1.2). The climate at the project site is dominated by the influence of the Pacific Ocean and the Pacific high-pressure system, a semi-permanent, subtropical high-pressure system located off the west coast of the United States. The size and strength of the Pacific high is at a maximum during the summer, when it is at its northernmost position, and results in strong northwesterly airflow and negligible precipitation. During this period, inversions become strong, winds are light, and the pollution potential is high. The Pacific high's influence weakens during the fall and winter when it moves southwestward, which allows storms from the Gulf of Alaska to reach northern California. About 77 percent of the region's annual rainfall occurs between December and March. During the winter, inversions are weak, winds often moderate, and the potential for air pollution is low.

Atmospheric stability is a measure related to turbulence, or the ability of the atmosphere to disperse pollutants due to convective air movement Mixing heights (the height above ground level through which the air is well mixed and in which pollutants can be dispersed) are lower during mornings due to temperature inversions and increase during the warmer afternoons. Staff's **Air Quality** section presents more detailed meteorological data.

EXISTING AIR QUALITY

The proposed site is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). By examining average toxic concentration levels from representative air monitoring sites in the project vicinity with cancer risk factors specific to each contaminant, lifetime cancer risk can be calculated to provide a background risk level for inhalation of ambient air. For comparison purposes, it should be noted that the overall lifetime cancer risk for the average individual in the United States is about 1 in 4, or 250,000 in one million.

The BAAQMD has a monitoring station in San Francisco at 10 Arkansas Street, 1.5 miles northwest of the project site (SFPUC 2005a section 8.1.3). In 2003, the background inhalation cancer risk calculated by the California Air Resources Board (CARB) for the Arkansas site was 134 in one million (CARB 2004). The pollutants 1,3-butadiene and benzene, emitted primarily from mobile sources, were the two highest contributors to risk and together accounted for over half of the total. The risk from 1,3-butadiene was about 32 in one million, while the risk from benzene was about 36 in one million. Formaldehyde accounts for about 10 percent of the 2003 average, with a risk of about 13 in one million. Formaldehyde is emitted directly from vehicles and other combustion sources, such as the proposed SFERP.

The use of reformulated gasoline, beginning in the second quarter of 1996, as well as other toxics reduction measures, have led to a decrease of ambient levels of toxics and associated cancer risk during the past few years. For example, in the Bay Area, cancer risk was 342 in one million based on 1992 data, 315 in one million based on 1994 data, and 303 in one million based on 1995 data. In 2002, the most recent year for which data is available, the average inhalation cancer risk decreased to 162 in one million (BAAQMD 2004b, p. 12).

EXISTING PUBLIC HEALTH CONCERNS

Staff has conducted a detailed study and analysis of existing public health issues in the project vicinity. This analysis was prepared in order to identify the current status of respiratory diseases (including asthma), cancer, and childhood mortality rates in the population located near the proposed project. Assessing existing health concerns in the project area will provide staff with a basis on which to evaluate the significance of any additional health impacts from the proposed SFERP project and evaluate any proposed mitigation.

Asthma

Staff finds that residents of neighborhoods in the southeastern area of San Francisco have some of the highest rates of asthma hospitalizations in the city. This is true for adults and for children. This is also true for children of other neighborhoods of San Francisco, including the Western Addition and Pacific Heights, the Richmond and Sea Cliff, the Sunset and St. Francis Wood areas, as well as Twin Peaks and Diamond Heights. Overall, the rate of adult and child asthma hospitalizations in San Francisco County is about the same as rates in Alameda County, greater than the rates in Contra Costa and Solano counties, and higher than the asthma target rates recommended by the Healthy People 2000 and Healthy People 2010 National Health Promotion & Disease Prevention Objectives. Please refer to **Public Health Appendix B** for staff's complete analysis.

Cancer

Staff finds that the observed cancer incidence rates for all cancers, breast cancer and childhood cancer for the Bayview-Hunters Point neighborhood are not greater than the rates expected for that population based on the rates reported for the greater San Francisco Bay Area, the state, and the nation. Please refer to **Public Health Appendix C** for the complete report.

Childhood Mortality

Staff found that in 1998, the overall infant mortality rate in San Francisco was lower than the Healthy People 2000 objective for infant mortality (5.3 deaths in SF per 1,000 live births versus the objective of 7 deaths per 1,000 live births). Infant and childhood mortality rates specific to the Bayview Hunters Point neighborhood of San Francisco were not identified in the literature. Within the African American population of San Francisco, however, the infant mortality rate was more than 3 times greater than the rate reported in white residents and 5 times greater than the rate in Hispanic residents. This trend is consistent with the Forum study (2004) that reports that child death rates in the U.S. by race/ethnicity are highest in non-Hispanic African American children. Since nearly half of the Bayview Hunters Point residents are African American, it seems likely that an increased rate of infant/childhood mortality would be observed in this population, as it is observed in the entire City of San Francisco and nation-wide. Please refer to **Public Health Appendix D** for the complete report.

A five-part series published by the San Francisco Chronicle on infant mortality rates in California (McCormick and Holding 2004) identified the Bayview-Hunters Point area as having significantly higher rates of infant mortality compared to the rest of San Francisco. Neighborhood-specific infant mortality rates were calculated using vital statistics data from each zip code for the years 1992 through 2001. All live births and infant deaths in a certain zip code were counted, and an infant mortality rate (deaths per 1000 births) was derived for the entire 10-year period (only zip codes that had at least 1000 births during this period were included).

The Chronicle staff that calculated infant mortality rates per zip code notes that this data is only intended as a general guideline and may not be statistically significant. They acknowledge that many of the zip code infant mortality rates "are not different enough from each other for the rankings to be considered indicative of statistically significant ongoing trends," and that looking at a different set of years would undoubtedly yield different results (McCormick and Holding 2004). In addition, several zip codes were created, eliminated, or had their boundaries change over the course of the 10-year period examined, which is not accounted for by the rates calculated.

Part 1 of this series focused on the Bayview-Hunters Point neighborhood (zip code 94124), which was found to have almost 2.5 times higher infant mortality rates than the rest of the City (11.8 deaths per 1000 births). Other Bay Area hot spots with elevated rates of infant mortality are found in pockets of Richmond (11.3) and Oakland (10.9). The article examined various factors that may account for the elevated rates, including poverty, inadequate housing, crime, violence, pollution, and race. The article suggested that the combination of all these factors produces elevated levels of stress hormones in pregnant women, which may account for the high number of premature births in neighborhoods such as Bayview-Hunters Point.

Overall, the article found that all aspects of inner-city life, including environmental pollution and stress, might contribute to high rates of infant mortality. In the case of the Bayview-Hunter Point neighborhood, the large African American population is likely to be a factor (65 percent of infant deaths in the period studied were from African American families), and a concentration of polluting industries may be another (the City's main power plants, sewage treatment plants, and the Hunters Point Naval Shipyard which is a former Superfund site are located in this neighborhood). The article

indicates that "new research is finding links between infant death and pesticides, air particles, smog and other types of pollution," but offers no specific references or evidence that pollution in the Bayview-Hunters Point area is higher than in other parts of the City. Similarly, the article notes that "studies show that residents of [Bayview-Hunters Point] face elevated rates of asthma, diabetes, and cervical and breast cancer," but no references are provided (McCormick and Holding 2004).

Staff reviewed the Chronicle series and the accompanying database of mortality rates per zip code, and found that infant mortality rates calculated for San Francisco are generally consistent with what staff has found (as described in **Public Health Appendix D**). However, the scientific literature reviewed by staff did not identify infant mortality rates per zip code, but rather by race, which is a well-documented and far more statistically significant trend.

Staff finds that the concerns raised in the Chronicle series are worthy of note and consideration by the City when evaluating their Air Quality Mitigation and Community Benefits Plan for the Bayview, Hunters Point, Dogpatch, and Potrero neighborhoods (see the Noteworthy Public Benefits section of this document). Staff also finds that its analysis of potential health impacts from the proposed SFERP uses a highly conservative methodology that accounts for impacts to the most sensitive individuals in a given population, including newborns and infants. According to the results of staff's health risk assessment, emissions from the SFERP would not contribute significantly to morbidity or mortality in any age or ethnic group residing in the project area (See **Public Health Appendix E**).

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

The Public Health section of this staff assessment discusses toxic emissions to which the public could be exposed during project construction and routine operation. Following the release of toxic contaminants into the air or water, people may come into contact with them through inhalation, dermal contact, or ingestion via contaminated food or water.

Air pollutants for which no ambient air quality standards have been established are called noncriteria pollutants. Unlike criteria pollutants such as ozone, carbon monoxide, sulfur dioxide, or nitrogen dioxide, noncriteria pollutants have no ambient (outdoor) air quality standards that specify levels considered safe for everyone.

Since noncriteria pollutants do not have such standards, a health risk assessment is used to determine if people might be exposed to those types of pollutants at unhealthy levels. The risk assessment consists of the following steps:

- Identify the types and amounts of hazardous substances that the SFERP could emit to the environment;
- Estimate worst-case concentrations of project emissions in the environment using dispersion modeling;

- Estimate amounts of pollutants to which people could be exposed through inhalation, ingestion, and dermal contact; and
- Characterize potential health risks by comparing worst-case exposure to safe standards based on known health effects.

Initially, a screening level risk assessment is performed using simplified assumptions that are intentionally biased toward protection of public health. That is, an analysis is designed that overestimates public health impacts from exposure to project emissions. In reality, it is likely that the actual risks from the power plant will be much lower than the risks as estimated by the screening level assessment. The risks for screening purposes are based on examining conditions that would lead to the highest, or worst-case risks, and then using those conditions in the study. Such conditions include:

- Using the highest levels of pollutants that could be emitted from the plant;
- Assuming weather conditions that would lead to the maximum ambient concentration of pollutants;
- Using the type of air quality computer model which predicts the greatest plausible impacts;
- Calculating health risks at the location where the pollutant concentrations are estimated to be the highest;
- Assuming that an individual's exposure to cancer-causing agents occurs continuously for 70 years; and
- Using health-based standards designed to protect the most sensitive members of the population (i.e., the young, elderly, and those with respiratory illnesses).

A screening level risk assessment will, at a minimum, include the potential health effects from inhaling hazardous substances. Some facilities may also emit certain substances that could present a health hazard from noninhalation pathways of exposure (OEHHA 2003, Tables 5.1, 6.3, 7.1). When these substances are present in facility emissions, the screening level analysis includes the following additional exposure pathways: soil ingestion, dermal exposure, and mother's milk (OEHHA 2003, p. 5-3).

The risk assessment process addresses three categories of health impacts: acute (short-term) health effects, chronic (long-term) noncancer effects, and cancer risk (also long-term). Acute health effects result from short-term (one-hour) exposure to relatively high concentrations of pollutants. Acute effects are temporary in nature, and include symptoms such as irritation of the eyes, skin, and respiratory tract.

Chronic health effects are those which arise as a result of long-term exposure to lower concentrations of pollutants. The exposure period is considered to be approximately from twelve to one hundred percent of a lifetime, or from eight to seventy years (OEHHA 2003, p. 6-5). Chronic health effects include diseases such as reduced lung function and heart disease.

The analysis for noncancer health effects compares the maximum project contaminant levels to safe levels called "reference exposure levels" or RELs. These are amounts of toxic substances to which even sensitive people can be exposed and suffer no adverse

health effects (OEHHA 2003, p. 6-2). These exposure levels are designed to protect the most sensitive individuals in the population, such as infants, the aged, and people suffering from illness or disease which makes them more sensitive to the effects of toxic substance exposure. The RELs are based on the most sensitive adverse health effect reported in the medical and toxicological literature, and include margins of safety. The margin of safety addresses uncertainties associated with inconclusive scientific and technical information available at the time of standard setting and is meant to provide a reasonable degree of protection against hazards that research has not yet identified. The margin of safety is designed to prevent pollution levels that have been demonstrated to be harmful, as well as to prevent lower pollutant levels that may pose an unacceptable risk of harm, even if the risk is not precisely identified as to nature or degree. Health protection is achieved if the estimated worst-case exposure is below the relevant reference exposure level. In such a case, an adequate margin of safety exists between the predicted exposure and the estimated threshold dose for toxicity.

Exposure to multiple toxic substances may result in health effects that are equal to, less than, or greater than effects resulting from exposure to the individual chemicals. Only a small fraction of the thousands of potential combinations of chemicals have been tested for the health effects of combined exposures. In conformance with the California Air Pollution Control Officers Association (CAPCOA) guidelines, the health risk assessment assumes that the effects of each substance are additive for a given organ system (OEHHA 2003, pp. 1-5, 8-12). Other possible mechanisms due to multiple exposure include those cases where the actions may be synergistic or antagonistic (where the effects are greater or less than the sum, respectively). For these types of substances, the health risk assessment could underestimate or overestimate the risks.

For carcinogenic substances, the health assessment considers the risk of developing cancer and assumes that continuous exposure to the cancer-causing substance occurs over a 70-year lifetime. The risk that is calculated is not meant to project the actual expected incidence of cancer, but rather a theoretical upper-bound number based on worst-case assumptions.

Cancer risk is expressed in chances per million, and is a function of the maximum expected pollutant concentration, the probability that a particular pollutant will cause cancer (called “potency factors”, and established by the California Office of Environmental Health Hazard Assessment - OEHHA), and the length of the exposure period. Cancer risks for each carcinogen are added to yield total cancer risk. The conservative nature of the screening assumptions used means that actual cancer risks due to project emissions are likely to be considerably lower than those estimated.

The screening analysis is performed to assess worst-case risks to public health associated with the proposed project. If the screening analysis predicts no significant risks, then no further analysis is required. However, if risks are above the significance level, then further analysis, using more realistic site-specific assumptions would be performed to obtain a more accurate assessment of potential public health risks. This more detailed analysis will also include a specific analysis to determine if a significant disproportional impact to a minority or low income population exists.

Significance Criteria

Commission staff determines the health effects of exposure to toxic emissions based on impacts to the maximum exposed individual. This is a person hypothetically exposed to project emissions at a location where the highest ambient impacts were calculated using worst-case assumptions, as described above.

As described earlier, non-criteria pollutants are evaluated for short-term (acute) and long-term (chronic) noncancer health effects, as well as cancer (long-term) health effects. The significance of project health impacts is determined separately for each of the three categories.

Acute and Chronic Noncancer Health Effects

Staff assesses the significance of non-cancer health effects by calculating a "hazard index." A hazard index is a ratio comparing exposure from facility emissions to the reference (safe) exposure level. A ratio of less than one signifies that the worst-case exposure is below the safe level. The hazard index for every toxic substance which has the same type of health effect is added to yield a total hazard index. The total hazard index is calculated separately for acute and chronic effects. A total hazard index of less than one indicates that cumulative worst-case exposures are less than the reference exposure levels. Under these conditions, health protection from the project is likely to be achieved, even for sensitive members of the population. In such a case, staff presumes that there would be no significant non-cancer project-related public health impacts.

Cancer Risk

Staff relied upon regulations implementing the provisions of Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986 (Health & Safety Code, §§ 25249.5 et seq.) for guidance to determine a cancer risk significance level. Title 22, California Code of Regulations, section 12703(b) states that "the risk level which represents no significant risk shall be one which is calculated to result in one excess case of cancer in an exposed population of 100,000, assuming lifetime exposure." This level of risk is equivalent to a cancer risk of ten in one million, or $10x10^{-6}$. An important distinction is that the Proposition 65 significance level applies separately to each cancer-causing substance, whereas staff determines significance based on the total risk from all cancer-causing chemicals. Thus, the manner in which the significance level is applied by staff is more conservative (health-protective) than that which applies to Proposition 65.

The significant risk level of ten in one million is consistent with the level of significance adopted by the Bay Area Air Quality Management District (BAAQMD) Board of Directors pursuant to Health and Safety Code § 44362(b), which requires notification of nearby residents when an air district determines that there is a significant health risk from a facility. In addition, BAAQMD's Toxic Air Contaminant Regulation (Regulation 2, Rule 5, adopted June 15, 2005) states that a project with an incremental cancer risk of between one and ten in one million is acceptable if best available control technology has been applied to reduce risk (BAAQMD 2005). In general, BAAQMD would not approve a project with a cancer risk exceeding ten in one million (regulations 2-5-301 and 2-5-302)

As noted earlier, the initial risk analysis for a project is typically performed at a screening level, which is designed to overstate actual risks, so that health protection can be ensured. Staff's analysis also addresses potential impacts on all members of the population including the young, the elderly, people with existing medical conditions that may make them more sensitive to the adverse effects of toxic air contaminants, and any minority or low income populations that are likely to be disproportionately affected by impacts. In order to accomplish this goal, staff utilizes the most current acceptable public health exposure levels (both acute and chronic) set to protect the public from the effects of airborne toxics. When a screening analysis shows cancer risks to be above the significance level, refined assumptions would likely result in a lower, more realistic risk estimate. If facility risk, based on refined assumptions, exceeds the significance level of ten in one million, staff would require appropriate measures to reduce the risk to less than significant. If, after all risk reduction measures had been considered, a refined analysis identifies a cancer risk greater than ten in one million, staff would deem such risk to be significant, and would not recommend project approval.

DIRECT/INDIRECT IMPACTS AND MITIGATION

CONSTRUCTION IMPACTS AND MITIGATION

Potential risks to public health during construction may be associated with exposure to toxic substances in contaminated soil disturbed during site preparation, as well as diesel exhaust from heavy equipment operation. Criteria pollutant impacts from the operation of heavy equipment and particulate matter from earth moving are examined in staff's **Air Quality** analysis.

Site disturbances occur during facility construction from excavation, grading, and earth moving. Such activities have the potential to adversely affect public health through various mechanisms, such as the creation of airborne dust, material being carried off-site through soil erosion, and uncovering buried hazardous substances.

A site characterization study was conducted on the proposed project site by Dames & Moore in 1987. The only findings were drums and containers that were subsequently disposed off-site. A site investigation of soil and groundwater in the area proposed to be occupied by the San Francisco Municipal Railway (MUNI) facility was conducted by AGS Inc. in 1999. The investigation concluded that both soil and groundwater in portions of the MUNI site are contaminated with petroleum hydrocarbons (from diesel), motor oil, Bunker C-oil, arsenic, and lead (SFPUC 2005a Section 8.13.3). Since the proposed SFERP site is adjacent to the proposed MUNI site and had been historically used for the same purpose, it is likely that the same levels of contamination exist in soil and groundwater at the SFERP site. For a more detailed discussion of the findings please refer to the **Waste Management** Section of this document.

Staff believes that adherence to current ordinances requiring identification and removal of asbestos containing materials (ACM), removal of regulated building materials, site soils and groundwater characterization and remediation, inclusion of the site under the neighboring MUNI site's Risk Management Plan, Site Management Plan, and deed

restrictions with San Francisco Bay Regional Water Quality Control Board oversight, and staff's proposed Conditions of Certification as described in the **Waste Management** Section of this document will be more than adequate to address any soil or groundwater contamination that exists on this site.

The operation of construction equipment will result in air emissions from diesel-fueled engines. Although diesel exhaust contains criteria pollutants such as nitrogen oxides, carbon monoxide, and sulfur oxides, it also includes a complex mixture of thousands of gases and fine particles. These particles are primarily composed of aggregates of spherical carbon particles coated with organic and inorganic substances. Diesel exhaust contains over 40 substances that are listed by the U.S. Environmental Protection Agency (U.S. EPA) as hazardous air pollutants and by CARB as toxic air contaminants.

Exposure to diesel exhaust may cause both short- and long-term adverse health effects. Short-term effects can include increased cough, labored breathing, chest tightness, wheezing, and eye and nasal irritation. Long-term effects can include increased coughing, chronic bronchitis, reductions in lung function, and inflammation of the lung. Epidemiological studies also strongly suggest a causal relationship between occupational diesel exhaust exposure and lung cancer.

Based on a number of health effects studies, the Scientific Review Panel (SRP) on Toxic Air Contaminants recommended a chronic REL (see REL discussion in Method of Analysis section above) for diesel exhaust particulate matter of 5 $\mu g/m^3$ and a cancer unit risk factor of $3x10^{-4}$ $(\mu g/m^3)^{-1}$ (SRP 1998, p. 6). [The SRP, established pursuant to California Health and Safety Code section 39670, evaluates the risk assessments of substances proposed for identification as Toxic Air Contaminants by CARB and the Department of Pesticide Regulation (DPR). The SRP reviews the exposure and health assessment reports and the underlying scientific data upon which the reports are based.] The SRP did not recommend a value for an acute REL, since available data in support of a value was deemed insufficient. On August 27, 1998, CARB listed particulate emissions from diesel-fueled engines as a toxic air contaminant and approved SRP's recommendations regarding health effect levels.

Construction of SFERP is anticipated to take place over a period of 12 months, including site preparation. As noted earlier, assessment of chronic (long-term) health effects assumes continuous exposure to toxic substances over a significantly longer time period, typically from eight to seventy years.

AFC Appendix 8.1D presents diesel exhaust emissions from engines and fugitive dust from construction activities. The applicant estimated worst-case hourly dust emissions of 22.8 lb/day of particulate matter less than 10 microns (PM10) and 10.9 lb/day of particulate matter less than 2.5 microns (PM2.5). Diesel emissions are generated from sources such as trucks, graders, cranes, welding machines, electric generators, air compressors, and water pumps. Modeling of construction activities including impacts of fugitive dust over a 12 month period resulted in predicted annual average concentrations of 1.1 $\mu g/m^3$ of PM10 and 0.6 $\mu g/m^3$ PM2.5 at any location (SFPUC 2005a, Table 8.1D-4). Mitigation measures are proposed by both the applicant and Air Quality staff to reduce the maximum calculated PM10 as well as PM2.5 concentrations.

These include the use of extensive fugitive dust control measures. The fugitive dust control measures are assumed to result in 90% reductions of emissions.

In order to mitigate potential impacts from particulate emissions during the operation of diesel-powered construction equipment, Air Quality staff recommends the use of ultra low sulfur diesel fuel **and** Tier 2 or Tier 1 California Emission Standards for Off-Road Compression-Ignition Engines or the installation of an oxidation catalyst **and** soot filters on diesel equipment. The catalyzed diesel particulate filters are passive, self-regenerating filters that reduce particulate matter, carbon monoxide, and hydrocarbon emissions through catalytic oxidation and filtration. The degree of particulate matter reduction is comparable for both mitigation measures in the range of approximately 85-92 percent. Such filters will reduce diesel emissions during construction and reduce any potential for significant health impacts. (See Condition of Certification **AQ-SC5** for staff's proposal to control particulate matter.)

OPERATION IMPACTS AND MITIGATION

Emissions Sources

The emissions sources at the proposed SFERP include three gas turbines and a two-cell cooling tower.

As noted earlier, the first step in a health risk assessment is to identify potentially toxic compounds that may be emitted from the facility.

Table 8.1A-5 of the Application for Certification (AFC) lists non-criteria pollutants that may be emitted from SFERP turbines as combustion byproducts, along with their anticipated amounts (emission factors). Table 8.1A-6 lists emission rates from cooling tower emissions. Emission factors are from the California Air Toxics Emission Factors (CATEF II) database (CARB 2001). Table 8.6-4 of the AFC lists toxicity values used to characterize cancer and noncancer health impacts from project pollutants. The toxicity values include RELs, which are used to calculate short-term and long-term noncancer health effects, and cancer unit risks, which are used to calculate the lifetime risk of developing cancer, as published in the OEHHA Guidelines (OEHHA 2003). **Public Health Table 2** lists toxic emissions and shows how each contributes to the health risk analysis. For example, the first row shows that oral exposure to acetaldehyde is not of concern, but if inhaled, may have cancer and chronic (long-term) noncancer health effects, but not acute (short-term) effects. In order to evaluate the potential health impacts from cooling tower emissions, staff reviewed information on the water quality to be used for cooling at SFERP.

The applicant states that the cooling water will be tertiary treated to Title 22 quality water for use in industrial processes. **Public Health Table 3** lists estimated emissions from the cooling towers.

PUBLIC HEALTH Table 2
Types of Health Impacts and Exposure Routes Attributed to Toxic Emissions*

Substance	Oral Cancer	Oral Noncancer	Inhalation Cancer	Noncancer (Chronic)	Noncancer (Acute)
Acetaldehyde			✔	✔	
Acrolein				✔	✔
Ammonia				✔	✔
Arsenic	✔	✔	✔	✔	✔
Benzene			✔	✔	✔
1,3-Butadiene			✔	✔	
Cadmium		✔	✔	✔	
Chromium VI		✔	✔	✔	
Copper				✔	✔
Diesel Exhaust			✔	✔	
Ethylbenzene				✔	
Formaldehyde			✔	✔	✔
Hexane				✔	
Lead	✔		✔		
Mercury		✔		✔	✔
Napthalene		✔	✔	✔	
Nickel		✔	✔	✔	✔
Polynuclear Aromatic Hydrocarbons (PAHs)	✔	✔	✔	✔	
Propylene				✔	
Propylene oxide			✔	✔	✔
Toluene				✔	✔
Xylene				✔	✔
Zinc				✔	

*Source:OEHHA 2003 Appendix L

PUBLIC HEALTH Table 3
Cooling Tower Emissions *

Constituent	Concentration in Cooling Tower Return Water (µg/l**)	Emissions (lb/hr)	Emissions (lb/day)	Emissions (lb/year)
Ammonia	1	3.91 E-08***	9.39 E-07	3.43 E-04
Arsenic	10	3.91 E-07	9.39 E-06	3.43 E-03
-+Cadmium	1.5	5.87 E-08	1.41 E-06	5.14 E-04
Chromium III (2)	6.5	2.54 E-07	6.10 E-06	2.23 E-03
Copper	73	2.85 E-06	6.85 E-05	2.50 E-02
Lead	12.5	4.89 E-07	1.17 E-05	4.28 E-03
Mercury	0.1	3.91 E-09	9.39 E-08	3.43 E-05
Nickel	19.5	7.63 E-07	1.83 E-05	6.68 E-03
PAHs	0.8	3.13 E-08	7.51 E-07	2.74 E-04
PCBs	0.5	1.96 E-08	4.69 E-07	1.71 E-04
Zinc	309	1.21 E-05	2.90 E-04	1.06 E-01

* calculated from maximum drift rate of 19.55 lb/hr
** micrograms per liter or parts per billion
Source: AFC Table 8.1A-6 (SFPUC 2005a)
*** E-08 is the same as 10^{-8}

Emissions Levels

Once potential emissions are identified, the next step is to quantify them by conducting a "worst case" analysis. Maximum hourly emissions are required to calculate acute (one-hour) noncancer health effects, while estimates of maximum emissions on an annual basis are required to calculate cancer and chronic (long-term) noncancer health effects.

The next step in the health risk assessment process is to estimate the ambient concentrations of toxic substances. This is accomplished by using a screening air dispersion model and assuming conditions that result in maximum impacts. The applicant's screening analysis was performed using the CARB/OEHHA Hotspots Analysis and Reporting Program (HARP) modeling program with a modification described in Amended AFC Appendix 8.1-C, Section 1.2. Finally, ambient concentrations were used in conjunction with RELs and cancer unit risk factors to estimate health effects which might occur from exposure to facility emissions. Exposure pathways, or ways in which people might come into contact with toxic substances, include inhalation, dermal (through the skin) absorption, soil ingestion, consumption of locally grown plant foods, and mother's milk.

The above method of assessing health effects is consistent with OEHHA's Air Toxics Hot Spots Program Risk Assessment Guidelines (OEHHA 2003) referred to earlier, and results in the following health risk estimates.

Impacts

The applicant's screening health risk assessment for the project, including combustion and non-combustion emissions, resulted in a maximum acute hazard index of 0.03 and

a maximum chronic hazard index of 0.002. The locations of the maximum acute and chronic hazards are shown in Figure 8.1C-1 of the amended AFC. As **Public Health Table 4** shows, both acute and chronic hazard indices are under the REL of 1.0, indicating that no short- or long-term adverse health effects are expected.

PUBLIC HEALTH Table 4
Operation Hazard/Risk at Point of Maximum Impact

Type of Hazard/Risk	Hazard Index/Risk	Significance Level	Significant?
ACUTE NONCANCER	0.03	1.0	No
CHRONIC NONCANCER	0.002	1.0	No
INDIVIDUAL CANCER	0.046×10^{-6}	10.0×10^{-6}	No

Source: SFPUC 2005a Section 8.6.4.2.1 and Tables 8.1C-2, 8.1C-3 and 81C-4.

As shown in **Public Health Table 4**, total worst-case individual cancer risk was calculated by the applicant to be 0.046 in one million at the location of maximum impact, which in this case is located in San Francisco Bay northeast of the proposed power plant (see SFPUC 2005a Figure 8.1C-1). The applicant also calculated a maximum cancer risk at the closest residence of 0.0008 in one million.

Staff reviewed the applicant's modeling and also conducted an independent risk assessment for the SFERP project using the CARB Hot Spots Analysis and Reporting Program (HARP). Staff's results are summarized below and the complete report including tables and figures can be found in **Public Health Appendix E**. Dispersion modeling and risk assessment were conducted by staff for source emissions under the following scenarios:

- all sources at SFERP (3 combustion turbines and 2 cooling tower cells)
- SFERP combustion turbines only
- SFERP cooling tower only

The analysis for cancer risk and noncancer hazard due to emissions from all 5 on-site sources (3 combustion turbines and 2 cooling tower cells) at the proposed SFERP facility estimated (using fine grid dispersion modeling) a cancer risk of 0.073 in one million at the point of maximum impact (PMI), which is located to the east of the facility boundary at the proposed construction laydown area. At the facility fenceline (conservatively assumed to be the location of the nearest workplace), cancer risk under the worker exposure scenario is 0.021 in one million. At the nearest residence located approximately 1,600 feet west of the facility, cancer risk is estimated to be 0.0014 in one million and at the nearest sensitive receptor located at Warm Water Cove Public Access (approximately 550 feet north of the facility), cancer risk is estimated to be 0.0027 in one million. Cancer risk at the maximally exposed sensitive receptor is 0.015 in one million at the Gloria B. Davis Middle School. All cancer risks due to emissions from SFERP are less than 1.0 in one million. All chronic and acute noncancer hazard indices are less than 1.0 indicating a lack of noncancer hazard from facility emissions at all receptors evaluated. Staff's results are summarized in **Public Health Table 5**.

PUBLIC HEALTH Table 5
Operation Hazard/Risk (Staff's Calculations)

Type of Hazard/Risk	Hazard Index/Risk	Significance Level	Significant?
ACUTE NONCANCER	0.038	1.0	No
CHRONIC NONCANCER	0.0027	1.0	No
INDIVIDUAL CANCER	0.073×10^{-6}	10.0×10^{-6}	No

Source: SFERP Preliminary Staff Assessment Appendix E Table 3.

Further analysis of SFERP emissions was conducted in which cancer risk and noncancer hazard were determined separately for the combustion turbines and the cooling towers. Results indicated that the majority of cancer risk estimated for the facility (0.073 in one million at the PMI located just outside the eastern facility boundary) is due to cooling tower emissions.

In conclusion, staff's analysis shows that, while slightly different from the applicant's, SFERP emissions would not present significant cancer risk or noncancer hazards to any member of the public, including low income and minority populations.

Cooling Tower

In addition to being a source of potential toxic air contaminants, the possibility exists for bacterial growth to occur in the cooling tower, including Legionella. Legionella is a bacterium that is ubiquitous in natural aquatic environments and is also widely distributed in man-made water systems. It is the principal cause of legionellosis, otherwise known as Legionnaires' Disease, which is similar to pneumonia. Transmission to people results mainly from inhalation or aspiration of aerosolized contaminated water. Untreated or inadequately treated cooling systems, such as industrial cooling towers and building heating, ventilating, and air conditioning systems, have been correlated with outbreaks of legionellosis.

Legionella can grow symbiotically with other bacteria and can infect protozoan hosts. This provides Legionella with protection from adverse environmental conditions, including making it more resistant to water treatment with chlorine, biocides, and other disinfectants. Thus, if not properly maintained, cooling water systems and their components can amplify and disseminate aerosols containing Legionella.

As noted in the LORS section above, the State of California regulates recycled water for use in cooling towers in Title 22, Section 60303, California Code of Regulations. This section requires that, in order to protect workers and the public who may come into contact with cooling tower mists, chlorine or another biocide must be used to treat the cooling system water to minimize the growth of Legionella and other micro-organisms. This regulation applies to the SFERP project since it intends to provide onsite treatment of recycled water to tertiary standards for cooling purposes. Legionella is not regulated by the BAAQMD but BAAQMD suggests that facilities follow guidelines and recommendations made by the Cooling Technology Institute (CTI) in their February

2000 report titled "Legionellosis, Guideline: Best Practices for Control of Legionella" (CTI 2000).

The U.S. EPA published an extensive review of Legionella in a human health criteria document (EPA 1999). The U.S. EPA noted that Legionella may propagate in biofilms (collections of microorganisms surrounded by slime they secrete, attached to either inert or living surfaces) and that aerosol-generating systems such as cooling towers can aid in the transmission of Legionella from water to air. The U.S. EPA has inadequate quantitative data on the infectivity of Legionella in humans to prepare a dose-response evaluation. Therefore, sufficient information is not available to support a quantitative characterization of the threshold infective dose of Legionella. Consequently, the presence of even small numbers of Legionella bacteria is presumed to present a risk, however small, of disease in humans.

In 2000 as noted above, the CTI issued its own report and guidelines for the best practices for control of Legionella (CTI 2000). The CTI found that 40-60 percent of industrial cooling towers tested was found to contain Legionella. More recently, staff has received a 2005 report of testing in cooling towers in Australia that found the rate of Legionella presence in cooling tower waters to be extremely low, approximately three to six percent. The cooling towers all had implemented aggressive water treatment and biocide application programs similar to that required by proposed Condition of Certification **Public Health-1**.

To minimize the risk from Legionella, the CTI noted that consensus recommendations included minimization of water stagnation, minimization of process leads into the cooling system that provide nutrients for bacteria, maintenance of overall system cleanliness, the application of scale and corrosion inhibitors as appropriate, the use of high-efficiency mist eliminators on cooling towers, and the overall general control of microbiological populations.

Good preventive maintenance is very important in the efficient operation of cooling towers and other evaporative equipment (ASHRAE 1998). Preventive maintenance includes having effective drift eliminators, periodically cleaning the system if appropriate, maintaining mechanical components in working order, and maintaining an effective water treatment program with appropriate biocide concentrations. Staff notes that most water treatment programs are designed to minimize scale, corrosion, and biofouling and not to control Legionella.

The efficacy of any biocide in ensuring that bacterial and in particular Legionella growth, is kept to a minimum is contingent upon a number of factors including but not limited to proper dosage amounts, appropriate application procedures and effective monitoring.

In order to ensure that Legionella growth is kept to a minimum, thereby protecting both nearby workers as well as members of the public, staff has proposed Condition of Certification **Public Health-1**. The condition would require the project owner to prepare and implement a biocide and anti-biofilm agent monitoring program to ensure that proper levels of biocide and other agents are maintained within the cooling tower water at all times, that periodic measurements of Legionella levels are conducted, and that periodic cleaning is conducted to remove bio-film buildup. Staff believes that with the

use of an aggressive antibacterial program coupled with routine monitoring and biofilm removal, the chances of Legionella growing and dispersing would be reduced to an insignificant level.

Impacts on Background Asthma, Cancer, and Childhood Mortality

Staff has described the existing public health status in the area of the power plant in an earlier part of this section. Staff found that residents of neighborhoods in the southeaster area of San Francisco, as well as several other neighborhoods in San Francisco, have some of the highest rates of asthma hospitalizations in the city. Yet, overall, the rate of adult and child asthma hospitalizations in San Francisco County is about the same as ra s in Alameda County, greater than the rates in Contra Costa and Solano counties, and hig er than the asthma target rates recommended by the Healthy People 2000 and Healthy People 2010 National Health Promotion & Disease Prevention Objectives. Asthma can b exacerbated and may even be caused by some of the same pollutants emitted from natural-gas-fired power plants, especially small particulate matter (PM10 and PM2.5). However, as discussed in greater detail in the Air Quality section of this staff assessmen all PM emitted by the proposed project (including PM2.5) would be mitigated with the implementation of staff's proposed Conditions of Certification AQ-10 and AQ-11, such th there would be no net gain of PM in the air. Furthermore, the closing of the Hunters Poin power plant may also result in decreased airborne levels of particulate matter in these neighborhoods. Therefore, staff concludes that the project would have an insignificant impact on existing asthma rates in this part of San Francisco, including minority and low income populations.

Staff also reviewed the existing cancer rates and childhood mortality incidences in the vicinity of the proposed power plant. Staff found that the observed cancer incidence rate for all cancers, breast cancer and childhood cancer for the Bayview-Hunters Point neighborhood are not greater than the rates expected for that population based on the rates reported for the greater San Francisco Bay Area, the state, and the nation. Staff di find that childhood mortality in the vicinity was greater than that found in the city but there are many causes of childhood mortality that are unrelated to power plant emissions. However, because the airborne concentrations of project emissions would be well below the RELs and the theoretical maximum cancer risk would be below the level of significan staff concludes that the proposed power plant's emissions would not contribute significan y to either childhood mortality or to cancer rates for any population in the area regardless o ethnicity or economic status. This conclusion is based on RELs and cancer potency fact s that are health-protective of all populations.

Prions

Because the proposed project would use treated wastewater for cooling, staff investigate th potential for exposure to prions that may be dispersed from the cooling tower. Prions ha been defined as "small proteinaceous infectious particles which resist inactivation by procedures that modify nucleic acids" (Microbiology & Immunology 2004). Perhaps the bst current working definition of a prion is "a proteinaceous infectious particle that lacks nucl c acid" (Prusiner 1997). The active component in prions is an abnormal protein called prio protein (abbreviated PrP), which has about 250 amino acids (Bolton 2000).

The smallest infectious prion particles are estimated to be somewhat smaller than viruses. Therefore, prions may not be retained by most of the filters that efficiently eliminate bacteria and viruses. Additionally, prions aggregate into particles of non-uniform size and cannot be solubilized by detergents, except under denaturing conditions where infectivity is lost (Bellinger-Kawahara 1988, Gabizon 1990, Safar 1990).

Humans might be infected by prions in two ways:

1. Acquired where an infectious agent is implicated.

A person can be exposed via diet by consuming nerve tissue of infected animals, and following certain medical procedures such as surgery, growth hormone injections, and corneal transplants. Acquired infection may occur by the ingested prions being absorbed across the gut wall and once in the body, they are believed to convert normal proteins in the nervous system into the abnormal prion shape.

1. Apparent hereditary

A person may actually inherit a gene that causes prions to form, much like a dominant trait.

There is no evidence of prion transmission via skin contact or aerosol transmission from one human to another (PHSICC 1997, CDC 1997) or through environmental exposures.

Prions appear to be very stable outside of a host. There is evidence that some prion diseases can be spread through soil. Groundwater may also be a potential disease reservoir. University of Wisconsin-Madison researchers showed that prions literally stick to some soil types (UWM 2003).

Despite this stability and resistance to routine disinfection methods, prions can be destroyed by the application of protein denaturing organic solvents such as phenol and alkali such as sodium hydroxide (NaOH). They are inactivated by one Normal (1N) NaOH, sodium hypochlorite (two percent free chlorine concentration; household bleach is approximately five percent free chlorine), and steam autoclaving at 132°C for 4.5 hours (Prusiner S.B. et al 1981, 1984, 1993; Taylor 1995, Taylor 1997).

Staff concludes, based on the evidence available to date, that it is doubtful that prions would be present in treated wastewater from the proposed SFERP wastewater treatment plant used for cooling at the facility and that if any prions are present, they would not pose a significant health risk to the public.

CUMULATIVE IMPACTS AND MITIGATION

The maximum cancer risk for emissions from SFERP (calculated by staff) is 0.073 in one million at a location east of the facility boundary. The maximum impact location occurs where pollutant concentrations from SFERP would theoretically be the highest. Even at this location, staff does not expect any significant change in lifetime risk to any person, and the increase does not represent any real contribution to the average lifetime cancer incidence rate due to all causes (environmental as well as life-style and genetic). Modeled facility-related residential risks are lower at more distant locations

and actual risks are expected to be much lower, since worst-case estimates are based on conservative assumptions and thus overstate the true magnitude of the risk expected. Therefore, staff does not consider the incremental impact of the additional risk posed by the SFERP to be either individually or cumulatively significant.

The worst-case long-term noncancer health impact from SFERP (0.0027 hazard index) is well below the significance level of 1.0 at the location of maximum impact. At this level, staff does not expect any cumulative health impacts to be the result of emissions from the proposed power plant. As with cancer risk, long-term hazard would be lower at all other locations.

The BAAQMD has in the past examined the issue of cumulative impacts from facilities affecting the same neighborhood. The Air District concluded that elevated concentrations of toxic air contaminants from stationary sources tend to be quite localized and that cumulative risks are likely to occur only when multiple facilities with substantially low-level emissions are immediately adjacent to, or very close to, one another (BAAQMD 1993). The proposed SFERP is located about 0.3 miles away from the existing Potrero Power Plant and within 1.5 miles of Hunters Point Power Plant, and thus cumulative impacts may occur as a result of all three power plants operating. In order to address the issue in regards to public health, staff has used information collected from the BAAQMD for the existing Potrero Power Plant's Health Risk Assessment in order to compare the points of maximum impact from the Potrero Power Plant and the SFERP and their potential cumulative impacts. The BAAQMD provided 2 points of maximum cancer impact for the Potrero Power Plant: 0.7 in one million, which occurs in the San Francisco Bay, and the second highest maximum impact 0.6 in one million, which occurs south of the Potrero Power Plant site near the intersection of Quesada and Lane Streets. The BAAQMD stated that the chronic hazard index of 0.2 was conservatively calculated, though the maximum impacts from each source at the power plant occurred at the same location as the maximum cancer impact, and that they do not have any information on the acute hazard index for the existing Potrero Power Plant (BBAQMD 2004a).

To further assess potential cumulative impacts, a detailed public health cumulative risk assessment was conducted for emissions of toxic air contaminants from facilities located in the vicinity of the proposed SFERP facility. Twenty (20) facilities were included in the analysis: all three power plants mentioned above, one water treatment control plant, three dry cleaners, ten gasoline dispensing service stations, a steel drum facility, a printing facility and SF Petroleum. A total of 50 sources were evaluated using CARB's Hot Spots Analysis and Reporting Program (HARP). The results are presented below and the complete report including the approach, assumptions, and all tables and figures can be found in **Public Health Appendix E** of this document.

Using fine grid modeling, the PMI for this analysis was identified in the neighborhood near One-Hour Martinizing, with a cancer risk of 19 in one million. Thus, estimates of cancer risk due to emissions from the proposed SFERP project, 0.073 in one million, are much less than the cancer risk calculated due to the cumulative emissions of facilities in the southeastern section of San Francisco. In the cumulative analysis, all off-site chronic noncancer hazard indices are less than 1.0, indicating a lack of chronic noncancer hazard from cumulative facility emissions at all receptors evaluated.

Acute noncancer hazard indices are less than 1.0 in all areas evaluated with the exception of the area just to the northeast of the Southeast Water Pollution Control Plant (SE WPCP).

Based on the results of this cumulative analysis (presented in Tables 3 and 6 of **Public Health Appendix E**), risk due to SFERP emissions contributes only 0.4 percent to the total risk estimated for the residence located nearest SFERP (0.0014 in one million for SFERP emissions compared to 0.37 in one million calculated for emissions from 20 facilities including SFERP). For the sensitive receptor located nearest SFERP, at Warm Water Cove Public Access Park, the contribution of risk due to SFERP emissions represents 1.2 percent to the total risk.

As described above, the contribution of SFERP to both cancer risk and chronic and acute noncancer disease are comparatively very small. Even in a cumulative context including other regional sources, the estimates for cancer risk from the SFERP project are less than significant. In addition, SFERP's contribution to chronic and acute noncancer disease is less than significant in a cumulative context.

COMPLIANCE WITH LORS

Staff concludes that construction and operation of the SFERP will be in compliance with all applicable LORS regarding long-term and short-term project impacts in the area of Public Health.

NOTEWORTHY PUBLIC BENEFITS

The City of San Francisco is in the process of developing an Air Quality-related particulate matter (PM10) mitigation and community benefits program, which would ensure reduction of emissions in the project vicinity, and minimize social, economic, and cultural impacts of the project. The City has arranged a number of public meetings and workshops to obtain public input and recommendations on air quality mitigation. The City has submitted a draft plan identifying infrastructure and capital improvements to reduce air pollution in the southeast part of San Francisco.

In addition, the City plans to operate local monitoring stations prior to SFERP operation that would collect information on air quality and provide a basis to address community concerns related to the possible need for further mitigation measures. One of these monitoring stations is located in Whitney Young Circle at Hudson and Progress streets and has already began collecting data on criteria and toxic air pollutants in the Hunters Point community (the station is planned to operate for approximately 12 months). Two other monitoring stations are planed to be located in the Potrero Hills and Dogpatch neighborhoods. Data collected from these local stations would be compared with data collected from the BAAQMD Arkansas Street monitoring station to determine if there are any significant local variations in air quality. Air quality data from the Whitney Young Circle and Arkansas Street stations have so far showed comparable concentrations of air pollutants (SFPUC 2005a Section 4.5). Depending on the data obtained from these stations, the City may continue to monitor the air quality in the southeast part of the City after SFERP start-up.

In addition to the above, it is noteworthy that one of the project objectives of SFERP is to enable the shutdown of Hunters Point Units 1 and 4. The City has been in discussions with the Independent System Operator (Cal ISO) regarding the prerequisites to such a shutdown and for the termination of the Reserve Must Run (RMR) contracts with the Mirant Potrero generating facility. This process is still evolving but it appears increasingly likely that the Hunters Point Units will shut down as a result of these efforts in the approximate time frame that SFERP comes on-line. (See the **Transmission System Evaluation** section of this staff assessment.) The Hunters Point units are old, have higher emissions, and have been a community health concern for many years. The final closure of these units will constitute a benefit to the surrounding community and the air basin by removing this concern.

RESPONSE TO AGENCY AND PUBLIC COMMENTS

Members of the community have provided verbal comments at workshops as well as pre-workshop meetings expressing concerns on a variety of public health issues. These issues include the existing health status of South East San Francisco neighborhoods, emissions from multiple existing and planned sources, and concerns over the placement of new and expanded MUNI bus yards. Staff has provided a discussion of the existing health issues in the Southeast portion of San Francisco in the **SETTING** section and cumulative impacts from multiple sources are addressed in the **CUMULATIVE IMPACTS** section. Concerns about the MUNI diesel bus yards will be addressed in the Final Staff Assessment for the SFERP.

CONCLUSIONS

Staff has analyzed potential public health risks associated with construction and operation of the SFERP and does not expect any significant adverse cancer, short-term, or long-term health effects to any members of the public, including low income and minority populations, from project toxic emissions. Staff also finds that the project would not contribute significantly to existing asthma, cancer, or childhood mortality rates in any population in the vicinity of the power plant.

PROPOSED CONDITION OF CERTIFICATION

Public Health-1 The project owner shall develop and implement a Cooling Water Management Plan to ensure that the potential for bacterial growth in cooling water is kept to a minimum. The Plan shall be consistent with either staff's "Cooling Water Management Program Guidelines" or with the Cooling Technology Institute's "Best Practices for Control of Legionella" guidelines but in either case, the Plan must include sampling and testing for the presence of Legionella bacteria at least every six months. After two years of power plant operations, the project owner may ask the CPM to re-evaluate and revise the Legionella bacteria testing requirement.

Verification: At least 60 days prior to the commencement of cooling tower operations, the Cooling Water Management Plan shall be provided to the CPM for review and approval.

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Public Health Appendix A

CRITERIA POLLUTANT HEALTH EFFECTS

OZONE (O_3)

Ozone is formed when reactive organic gases are mixed with nitrogen oxides in the presence of sunlight. Heat speeds up the reaction, typically leading to higher concentrations in the summer months. Ozone is a colorless, very reactive gas which oxidizes other materials. Oxidation damages living cells and tissues by altering their protein, lipid, and carbohydrate components or products. Such damage leads to dysfunction and death of cells in the lung and in other internal tissues.

The U.S. EPA revised the federal ozone standard on July 18, 1997 (62 Fed. Reg. 38856), based on new health studies which became available since the standard was last revised in 1979. These new studies showed that adverse health effects occur at lower ambient concentrations over longer exposure times than those reflected in the previous standard, which was based on acute health effects associated with heavy exercise and short-term exposures. The U.S. EPA's proposed ozone rule lists health effects which have been attributed to result from short-term (one to three hours) and prolonged (six to eight hours) exposure to ozone (61 Fed. Reg. 65719). However, a 1999 federal court ruling blocked implementation of the ozone 8-hour standard. EPA has asked the U.S. Supreme Court to reconsider that decision.

Acute health effects induced by short-term exposures include transient reductions in pulmonary function, and transient respiratory symptoms including cough, throat irritation, chest pain, nausea, and shortness of breath with associated effects on exercise performance. Other health effects associated with short-term or prolonged O_3 exposures include increased airway responsiveness (a predisposition to bronchoconstriction caused by external stimuli such as pollen and dust), susceptibility to respiratory infection by impairing lung defense mechanisms, increased hospital admissions and emergency room visits, and transient pulmonary inflammation.

Generally, groups considered especially sensitive to the effects of air pollution include persons with existing respiratory diseases, children, pregnant women, and the elderly. However, controlled exposure data on people in clinical settings have indicated that the populations at greatest risk of acute effects from ozone exposures are children and adults engaged in physical exercise. Children are most at risk because they are active outside, playing and exercising, during the summer when ozone levels are at their highest. Adults who are outdoors and engaging in activities involving heavy levels of exertion during the summer months are also among those most at risk. Exertion increases the amount of O_3 entering the airways and can cause O_3 to penetrate to peripheral regions of the lung where lung tissue is more likely to be damaged. These individuals, as well as those with respiratory illnesses, such as asthma, can experience a reduction in lung function and increased respiratory symptoms, such as chest pain and cough, when exposed to relatively low ozone levels during periods of moderate exertion.

CARBON MONOXIDE (CO)

Carbon monoxide is a colorless, odorless gas which is a product of inefficient combustion. It does not persist in the atmosphere, but is quickly converted to carbon dioxide. However, it can reach high levels in localized areas, or "hot spots".

CO reduces the oxygen carrying capacity of the blood, thereby disrupting the delivery of oxygen to the body's organs and tissues. Persons sensitive to the effects of carbon monoxide include those whose oxygen supply or delivery is already compromised. Thus, groups potentially at risk to carbon monoxide exposure include persons with coronary artery disease, congestive heart failure, obstructive lung disease, vascular disease, anemia, the elderly, newborn infants, and fetuses (CARB 1989, p. 9). In particular, people with coronary artery disease were found to be especially at risk from carbon monoxide exposure (CARB 1989, p. 9). Tests conducted on patients with confirmed coronary artery disease indicated that exposure to low levels of carbon monoxide during exercise produced significant cardiac effects. These included earlier onset of chest pain (angina) and electrocardiographic changes indicative of effects on the heart muscle (CARB 1989, p. 6). Such changes can limit the ability of patients with coronary artery disease to exert themselves even moderately. Therefore, the statewide carbon monoxide one hour and eight hour standards were adopted in part to prevent aggravation of chest pain. Additionally, however, the standards are intended to prevent decreased exercise tolerance in persons with peripheral vascular disease and lung disease, impairment of central nervous system functions, and increased risk to fetuses (Title 17, Cal. Code Regs., sec§70200).

PARTICULATE MATTER (PM)

Particulate matter is a generic term for particles of various substances, which occur as either liquid droplets or small solids of a wide range of sizes. Particles with the most potential to adversely affect human health are those less than 10 micrometers (millionths of a meter) in diameter (or PM10), which may be inhaled and deposited within the deep portions of the lung (PM10). PM may originate from anthropogenic or natural sources such as stationary or mobile combustion sources or windblown dust. Particles may be emitted directly to the atmosphere or result from the physical and chemical transformation of gaseous emissions such as sulfur oxides, nitrogen oxides, and volatile organic compounds. PM10 may be made up of elements such as carbon, lead, and nickel; compounds such as nitrates, organics, and sulfates; and complex mixtures such as diesel exhaust and soil fragments. The size, chemical composition, and concentration of ambient PM10 can vary considerably from area to area and from season to season within the same area.

PM10 can be grouped into two general sizes of particles, fine and coarse, which differ in formation mechanisms, chemical composition, sources, and potential health effects. Fine-mode particles are those with a diameter of 2.5 micrometers or less (PM2.5), while the coarse-mode fraction of PM consists of particles ranging from 10 micrometers down to 2.5 micrometers in diameter.

Coarse-mode PM10 is formed by crushing, grinding, and abrasion of surfaces, and in the course of reducing large pieces of materials to smaller pieces. Coarse particles

consist mainly of soil dust containing oxides of silicon, aluminum, calcium, and iron; as well as fly ash, particles from tires, pollen, spores, and plant and insect fragments. Coarse particles normally have shorter lifetimes (minutes to hours) and only travel over short distances (of less than tens of kilometers). They tend to be unevenly distributed across urban areas and have more localized effects than the finer particles.

PM2.5 is derived both from combustion by-products, which have volatilized and condensed to form primary PM2.5, and from precursor gases reacting in the atmosphere to form secondary PM2.5. Components include nitrates, organic compounds, sulfates, ammonium compounds, and trace elements (including metals) as well as elemental carbon such as soot. Major sources of PM2.5 are fossil fuel combustion by electric utilities, industry and motor vehicles, vegetation burning, and the smelting or other processing of metals. Dry deposition of fine mode particles is slow allowing such particles to often exist for long periods of time (of from days to weeks) in the atmosphere and travel hundreds to thousands of kilometers. They tend to be uniformly distributed over urban areas and larger regions and are removed from the atmosphere primarily by forming cloud droplets and falling out within raindrops.

The health effects of PM10 from any given source usually depend on the toxicity of its constituent pollutants. The size of the inhaled material usually determines where it is deposited in the respiratory system. Coarse particles are deposited most readily in the nose and throat area while the finer particles are more likely to be deposited within the bronchial tubes and air sacs, with the greatest percentage deposited in the air sacs. Until recently, PM10 particles had been considered to be the major fraction of airborne particulates responsible for various adverse health effects. The PM10 fraction is known to be capable of penetrating the thoracic and alveolar regions of the human and animal lungs. The PM2.5 fraction, however, was found to pose a significantly higher risk for health. This is due to their size and associated deposition and retention characteristics in the respiratory tract, enabling it to penetrate and deposit within the deeper alveolar regions of the lung. The following aspects of PM2.5 deposition all contribute to the more serious health effects attributed to smaller particles:

- The deposition of PM2.5 favors the periphery of the lungs, which is especially vulnerable to injury for anatomical reasons.
- Clearance of the PM2.5 from within the deeper reaches of the lungs is a much slower process than from the upper regions. Consequently, the residence time is longer, implying longer exposure, and hence greater risk.
- The human anatomy further allows the penetration of the superficial tissues by PM2.5 and entry into the bodily circulation without much effort in the periphery of the lungs.

Many epidemiological studies have shown exposure to particulate matter capable of inducing a variety of health effects, including premature death, aggravation of respiratory and cardiovascular disease, changes in lung function and increases in existing respiratory symptoms, effects on lung tissue structure, and impacts on the body's respiratory defense mechanisms. The underlying biological mechanisms are still poorly understood. Based on their review of a number of these epidemiological studies

(as published after 1987 when the federal standards were revised), together with suggestion of PM2.5 concentrations as a more reliable surrogate for the health impacts of the finer fraction of PM than PM10, the U.S. EPA concluded that the then-current standards were not sufficiently stringent to protect against significant effects in exposed humans. Therefore, federal PM standards were revised on July 18, 1997 (62 Fed. Reg. 38652) to add new annual and 24-hour PM2.5 standards to the existing annual and 24-hour PM10 standards. Taken together, these new standards were meant to provide additional protection against a wide range of PM-related health effects, including premature death, increased hospital admissions and emergency room visits, primarily among sensitive individuals such as the elderly, children and individuals with cardiopulmonary diseases such as asthma. Other impacts include decreased lung function (particularly in children and asthmatics), and alterations in lung tissue and structure.

California has also had 24-hour and annual standards for PM10 (CARB 1982, pp. 81,84). These studies were aimed at establishing the PM10 levels capable of inducing asthma, premature death and bronchitis-related symptoms. They were set to protect against such impacts in the general population as well as sensitive individuals such as patients with respiratory disease, declines in pulmonary function, especially as related to children (Tit. 17, Cal. Code Regs., sec. 70200). These standards were set to be more stringent than the federal standard, which the ARB regarded as inadequate for the protection desired (CARB 1991, p. 26).

On June 20, 2002, the ARB approved the adoption of a lower annual state standard for PM10, as well as a new annual standard for PM2.5 (CARB 2002). The 24-hour PM10 standard was not changed. The standards were established to prevent excess death, illnesses such as respiratory symptoms, bronchitis, asthma exacerbation, and cardiac disease, and restrictions in activity from short- and long-term exposures (Title 17, Cal. Code Regs., sec. 70200).

NITROGEN DIOXIDE (NO_2)

Nitrogen dioxide is formed either directly or indirectly when oxygen and nitrogen in the air combine during combustion processes. It is a relatively insoluble gas which is able to penetrate deep into the lungs, its principal site of toxicity. Its toxicity is thought to be due to its capacity to initiate free radical reactions and to oxidize cellular proteins and other biomolecules (CARB 1992, Appendix A, p. 4).

Sublethal exposures in animals produce inflammation and various degrees of tissue injury characteristic of oxidant damage (Evans in CARB 1992, Appendix A, p. 5). The changes produced by low-level acute or subchronic exposure appear to be reversible when animals are allowed to recover in clean air.

Health effects of particular concern in relation to low-level nitrogen dioxide exposure include: (1) effects of acute exposure on some asthmatics and possibly on some persons with chronic bronchitis, (2) effects on respiratory tract defenses against infection, (3) effects on the immune system, (4) initiation or facilitation of the

development of chronic lung disease, and (5) interaction with other pollutants (CARB 1992, Appendix A, p. 5).

Several groups which may be especially susceptible to nitrogen dioxide related health effects have been identified (CARB 1992, Appendix A, p. 3). These include asthmatics, persons with chronic bronchitis, infants and young children, cystic fibrosis and cancer patients, people with immune deficiencies, and the elderly.

Studies using controlled brief exposures on sensitive groups have shown an increase in bronchial reactivity or airway responsiveness of some asthmatics, and decreased lung function in some patients with chronic obstructive lung disease (CARB 1992, Appendix A, p. 2). In general, bronchial hyperreactivity (an exaggerated tendency of the airways to constrict) is markedly greater in asthmatics than in nonasthmatics upon exposure to respiratory irritants (CARB 1992a, p. 107). At exposure concentrations relevant to the current one hour ambient standard, there appears to be little, if any, effect on respiratory symptoms of asthmatics (CARB 1992a, p. 108).

SULFUR DIOXIDE (SO_2)

Sulfur dioxide is formed when any sulfur-containing fuel is burned. SO_2 is highly soluble and consequently absorbed in the moist passages of the upper respiratory system. Exposure to sulfur dioxide can cause changes in lung cell structure and function that adversely affect a major lung defense mechanism known as muco-ciliary transport. This mechanism functions by trapping particles in mucus in the lung and sweeping them out via the cilia (fine hair-like structures) also in the lung. Slowed mucociliary transport is frequently associated with chronic bronchitis.

Exposure to sulfur dioxide can produce both short- and long-term health effects. Therefore, California has established sulfur dioxide standards to reflect both short- and long-term exposure concerns. Based on controlled exposure studies of human volunteers, investigators have found that asthmatics comprise the group most susceptible to adverse health effects from exposure to sulfur dioxide (CARB 1994, p. V-1).

The primary short-term effect is bronchoconstriction, a narrowing of the airways which results in labored breathing, wheezing, and coughing. The short-term (one hour) standard is based on bronchoconstriction and associated symptoms (such as wheezing and shortness of breath) in asthmatics and is designed to protect against adverse effects from five to ten minute exposures. In the opinion of the California Office of Environmental Health Hazard Assessment, the short-term ambient standard is likely to afford adequate protection to asthmatics engaged in short periods of vigorous activity (CARB 1994, Appendix A, p. 16).

Longer-term exposure is associated with an increased incidence of respiratory symptoms (e.g., coughing and wheezing) or respiratory disease, decreases in pulmonary function, and an increased risk of mortality (CARB 1991a, p. 12). The long-term (24 hour) standard is based upon increased incidence of respiratory disease and excess mortality. The standard includes a margin of safety based on epidemiological studies which have shown adverse respiratory effects at levels slightly above the

standard. Some of the studies indicate a sulfur dioxide threshold for effects, whereby "no adverse effects" are expected from exposures to concentrations at the state standard (Ibid.).

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Public Health Appendix B

Respiratory Disease Incidence in the Southeast Section of San Francisco

September 2004

RESPIRATORY DISEASE INCIDENCE IN THE SOUTHEAST

SECTION OF SAN FRANCISCO

INTRODUCTION

The Application for Certification (04-AFC-1), submitted by the City and County of San Francisco to the CEC in 2004, has initiated an extensive review of the environmental and public health impacts of the proposed simple-cycle peaking power plant, the San Francisco Electric Reliability Project (SFERP).

The purpose of this assessment is to identify the current status of respiratory disease - using asthma as the metric - in the population located near the proposed power plant (the Bayview Hunter's Point neighborhoods in the southeast section of San Francisco) to enable a comparison of the prevalence of respiratory disease in this area with such disease in populations located in other parts of San Francisco, the state, and the nation.

ASTHMA

The Asthma Epidemic and Causes

Asthma has emerged as a major public health problem in this country over the last 20 years (Kreutzer 1998; U.S. EPA 2003). Over that time period, asthma incidence in the U.S. has increased while asthma mortality and hospitalization rates have decreased (American Lung Association 2004). Asthma rates among children have reached epidemic proportions in this state and throughout the entire United States (Kreutzer 1998; Thompson 2002; Bell 2002).

Based on a 2002 national estimate of asthma prevalence, 30.8 million Americans (11,060 per 100,000 population) had been diagnosed with asthma within their lifetime. The national rate for children aged 5-17 years old was reported to be 14,000 per 100,000 (ALA 2004a). In 2002, 20 million Americans, including 6.1 million children, experienced asthma symptoms, for rates of 7,180 per 100,000 for all Americans and 9,190 per 100,000 for children (ALA 2004a). Over 600 people die from asthma each year in California (DHS 2000).

It has been estimated that in 2001, 3.9 million California adults and children, (11.9% of the state's population) had been diagnosed with asthma in their lifetime, a rate referred to as "lifetime asthma prevalence" (DHS 2003, Meng et al. 2003).

There are many theories about the causes of asthma (Redd 2002) but a consensus exists that lifestyle factors, genetics, environmental exposures and air pollution (Weisel 2002) are the major causes. Racial differences exist in terms of the incidence of asthma, which is 2 to 3 times higher among African-Americans than among Caucasian Americans (Redd 2002). Non-environmental factors which have been associated with asthma in the literature include obesity (Redd 2002; Rodriguez 2002), low income (Von Behren 2002; Castro 2001), low education level (Arif 2003), smoking (Von Behren 2002;

Arif 2003), and African-American ethnicity (Rodriguez 2002; Von Behren 2002; Castro 2001).

The American Lung Association lists the following factors as possible causes of poor air quality at schools (ALA 2000): molds, diesel bus fumes, old ventilation systems, solvents, marker fumes, chalk dust and pesticides. These agents can trigger asthma attacks in students. In the home, asthma can be triggered by conditions commonly found in substandard housing such as old carpet, molds, cockroach wastes and dust mites.

Coarse and fine fractions of Particulate Matter (PM10 and PM2.5, respectively) are also associated with an increased disease severity as manifested by increased admissions to hospital for asthma (Peden 2002). The California Air Resources Board (CARB), in an exhaustive compilation of the available scientific studies to date, summarized over eighteen studies assessing the ability of PM – fine and coarse - to exacerbate asthma (CARB 2002). CARB found that "evidence for a fairly consistent (but not universal) effect of PM10/2.5 has emerged over the last several years." But PM causation of asthma has not been proved.

Rates of Asthma Reported in San Francisco

Asthma rates in San Francisco have been reported based on three different sources of information: asthma mortality rates, asthma hospitalization data and a community and school-based survey regarding asthma.

Asthma Mortality Data

The California Department of Health Services reported asthma mortality statistics for 199(to 1997 in the "California Asthma Mortality Chart Book" (DHS 2000). Age-adjusted asthm mortality rates for 1990 to 1997, for all ages in San Francisco County, are shown below. The mortality rate observed in African-Americans is 2.4 times greater than the rate observed in non-Hispanic whites in San Francisco.

	Age-adjusted asthma mortality rate in San Francisco County (in deaths per 100,000)
Total (all races/ethnicities)	2.46
Non-Hispanic White	1.69
African-American	4.11
Hispanic	0.90
Asian/Pacific Islander	3.44

Asthma Hospitalization Data

Asthma hospitalization data provide information on patients with asthma so severe that they are admitted to the hospital for treatment. These data do not provide information on asthma incidence in the population or on how many people visit private doctors, emergen rooms or outpatient clinics for asthma, or on the mortality rate of asthma.

National and regional asthma hospitalization data were presented and evaluated by Jennifer Mann of the San Francisco Department of Public Health in a publication entitled

"Asthma in San Francisco" (Mann 2000). This study also cites the California Department of Health Services County Chart Book (1991-1994) which reports that age-adjusted asthma hospitalization rates are 2-3 times higher for African-American children compared to white, non-Hispanic children.

Similar trends in age-adjusted asthma hospitalization rates are reported by DHS in Alameda and San Francisco counties in the updated County Chart Book for asthma hospitalization rates in California counties for 1998 to 2000 (DHS 2003). Age-adjusted asthma hospitalization rates by race/ethnicity for all ages and for children (ages 0-14) are presented below (annual rates per 100,000):

	Total	non-Hispanic White	African-American	Hispanic	Asian/ Pacific Islander
All Ages:					
California	111	95	330	103	78
Alameda	179	111	431	117	110
San Francisco	122	94	342	105	84
Children (< 15 yrs):					
California	181	149	576	149	97
Alameda	379	177	968	239	178
San Francisco	187	147	365	194	116

In 1999, Nancy Warren of the Bay Area Regional Asthma Management and Prevention Initiative (RAMP) reported and compared asthma hospitalization rates in San Francisco, Alameda, Contra Costa and Solano counties for 1994-1996 (Warren 1999). In the Warren study, hospital discharge data were obtained from the Office of Statewide Planning and Development (OSHPD) Hospital Discharge Database 1994-1996. Warren concluded that children less than 15 years old, African-Americans and people living in urban areas have high rates of asthma hospitalizations. Information from the Warren study is also presented in the Mann study. The following sections contain information presented in both studies (unless otherwise noted).

Asthma Hospitalization Data for All Ages in San Francisco

The Warren (1999) study reports that, in San Francisco, the Bayview Hunter's Point area (zip code 94124) had the highest age-adjusted annual asthma hospitalization rate for all ages: 491 per 100,000. This rate is greater than the target rate of 160 per 100,000 recommended by the Healthy People 2000 National Health Promotion & Disease Prevention Objectives for asthma hospitalization rates (DHHS 1999). Nine zip codes in San Francisco (of 21 zip codes evaluated) had hospitalization rates above the target value.

More recent data was provided by the Community Action to Fight Asthma (CAFA 2004a) for three-year averaged hospitalization rates for four Bay Area counties for the years 1998-2001. Data was obtained from OSHPD at the zip code tabulation area level (ZCTA). The Bayview Hunter's Point neighborhood again had the highest age-adjusted annual asthma hospitalization rate for all ages: 352 per 100,000 for 1998-2001. Of the 26 zip codes in San

Francisco reported in the CAFA 2004 data, twelve zip codes had hospitalization rates above the Healthy People 2010 value of 93 per 100,000.

Data from these two studies are presented below for neighborhoods located in San Francisco (see Figure 1):

Asthma hospitalization rate, all ages (cases per 100,000):

Zip Code	Neighborhood	Warren (1999) 1994-1996		CAFA (2004a) 1998-2001	
		Rate	95% CI	Rate	95% CI
94102	Tenderloin	269	(232-309)	274	(235-319)
94103	South of Market	310	(260-364)	169	(136-211)
94104	Financial District	n/a		783*	(261-2770)
94105	Financial District	n/a		200*	(86-1270)
94107	Potrero Hill	306	(248-369)	192	(147-248)
94110	Mission/Bernal Heights	238	(218-259)	191	(171-213)
94111	Embarcadero	n/a		212*	(56-592)
94112	City College	206	(186-228)	137	(121-154)
94115	Western Addition	318	(277-361)	190	(159-226)
94117	Haight	191	(163-221)	135	(107-171)
94124	Bayview Hunter's Point	491	(444-541)	352	(316-393)
94134	Visitacion Valley	294	(262-328)	197	(172-224)

* Rates based on small populations; wide confidence intervals indicate high uncertainty in rates.
n/a = not available

Overall, San Francisco County had an age-adjusted rate of 190 per 100,000 (all ages). Asthma hospitalization rates reported in three other Bay Area counties (age-adjusted, all ages, rate per 100,000) are: Alameda County - 187, Contra Costa County - 127, and Solano County - 127.

By ethnicity (all ages), African-Americans in San Francisco exhibited the highest asthma hospitalization rate (478 per 100,000). In the Hispanic population the rate was 203 per 100,000, in the Asian population the rate was 142 per 100,000 and in the white populatio the rate was 107 per 100,000.

Data on lifetime asthma prevalence in California counties were collected in the 2001 California Health Interview Survey (CHIS; Meng et al. 2003). CHIS conducted phone interviews of over 55,000 households from throughout California between November 200 and September 2001. The overall response rate was 37%. Asthma symptom prevalence refers to people who have been previously diagnosed with asthma and experienced asthma symptoms in 2001. Pertinent data collected on asthma symptom prevalence in 2001 are summarized below.

	Children (ages 1-17)	Adults (ages >18)	All Ages
Greater Bay Area	10.2%	9.0%	9.3%
Alameda County	9.9%	10.2%	10.1%
San Francisco County	10.5%	8.3%	8.6%

Asthma Hospitalization Data for Children in San Francisco

Children younger than 15 in San Francisco County had an asthma hospitalization rate (441 per 100,000) almost twice the Healthy People 2000 target of 225 per 100,000 for this age group and 2.5 times greater than the Healthy People 2010 target of 173 per 100,000 for ages younger than 18 years. By ethnicity (children under 15 years old), African-American children in San Francisco had the highest asthma hospitalization rate of 785 per 100,000. In the Hispanic population the rate was 544 per 100,000, in the Asian population the rate was 303 per 100,000 and in the white population the rate was 232 per 100,000.

Fifteen zip codes in San Francisco (of 18 zip codes evaluated) had hospitalization rates above the Healthy People 2000 target value for children under the age of 15 in 1994-1996. The highest rate was reported for Bayview Hunter's Point (approximately 850 per 100,000; Warren 1999).

More recent data on three-year averaged hospitalization rates for children in San Francisco were obtained for the years 1998-2001 (CAFA 2004a). The Bayview Hunter's Point neighborhood again had the highest age-adjusted annual asthma hospitalization rate for children under 15 years old: 503 per 100,000 for 1998-2001. Of the 26 zip codes in San Francisco reported in the CAFA 2004a data, thirteen zip codes had hospitalization rates above the Healthy People 2010 value of 173 per 100,000. Neighborhoods located in San Francisco had the following rates:

Asthma hospitalization rate, children 0-14 years old (cases per 100,000; confidence intervals not presented in Warren study):

Zip Code	Neighborhood	Warren (1999) 1994-1996	CAFA (2004a) 1998-2001	
		Rate	Rate	95% CI
94102	Tenderloin	477	403	(277-568)
94103	South of Market	542	216	(119-362)
94107	Potrero Hill	730	483	(314-716)
94110	Mission/Bernal Heights	575	314	(257-380)
94112	City College	470	313	(260-375)
94114	Castro/Noe Valley	330	219	(116-381)
94115	Western Addition	825	303	(203-436)
94116	Parkside/Forest Hill	220	228	(163-310)
94117	Haight	380	154	(79-277)
94118	Inner Richmond/Presidio	225	182	(118-270)
94121	Richmond/Sea Cliff	380	224	(155-314)
94122	Sunset	300	145	(97-208)
94124	Bayview Hunter's Point	850	503	(416-603)

94127	St. Francis Wood/West Portal	310	234	(145-359)
94131	Twin Peaks/Diamond Heights	340	132	(69-232)
94132	Lake Merced	406	141	(77-236)
94134	Visitacion Valley	680	295	(230-373)

Community and School Asthma Surveys

In 1998 the principal at G.W. Carver Elementary School in the Bayview Hunter's Point community of San Francisco observed that many children at the school had asthma. Studies and evaluations were set into motion by this observation and reports were published by the United States Environmental Protection Agency (EPA 2000), the American Lung Association (ALA 2000), the San Francisco Department of Public Health (Mann 2000) and the Bayview Hunter's Point Healthy Start Collaborative (Epps-Miller and Legion 1999).

The EPA conducted an indoor air evaluation at Carver Elementary School and Charles Drew Elementary School (also located within zip code 94124). EPA's Indoor Air Quality (IAQ) Tools for Schools program was instituted at the schools and a joint IAQ team was created which included the school nurse, facilities manager, maintenance supervisors, custodial supervisors, planners, architects and representatives from the school district's health program. The IAQ team was trained to implement the school district's new IAQ policy, using the EPA Tools for Schools program. Additionally, indoor air sampling and analysis was conducted at both schools and walkthroughs were organized with the IAQ team to evaluate building performance and ventilation. IAQ problems (not specified in the EPA document) were identified during the walkthrough and recommendations were made During the walkthrough at one school it was noted that the ventilation system had been inadvertently shut off. This was remedied. Other recommendations (not specified in the EPA document) by the EPA were implemented at the schools and indoor air quality and airflow throughout the schools improved. The EPA reported that office visits by students to use their asthma inhalers were reduced by half and that, even though the number of students with asthma did not change, asthma episodes became less frequent (EPA 2000)

The Bayview Hunter's Point Health and Environmental Assessment Task Force (HEATF), in collaboration with researchers at the University of California at San Francisco and the San Francisco Department of Public Health, conducted a community asthma survey (Mann 2000). Adult residents were asked how many people in their home had asthma. Results of the survey indicate that, overall, 10% of people living in Bayview Hunter's Point have asthma and 15.5% of children were reported as having asthma. Mann (2000) reports that in 1995 the national prevalence of self-reported asthma was 5.6% for all ages and 7.4% in children aged 5-14.

Another survey, of elementary and middle school aged children, was conducted by the Asthma Task Force of the Bayview Hunter's Point Healthy Start Collaborative. Results were released May 19, 1999 in a report entitled "Condition Critical - The Bayview/Hunter's Point School/Community Asthma Survey". Six Bayview Hunter's Point elementary and middle schools were included in the survey and 665 parents or caregivers of 2,150 students responded (30% overall response rate). Results of the survey indicate that 17% of caregivers had a child diagnosed with asthma and 19% had children with asthma-like symptoms.

Demographics of Bayview Hunter's Point

The population characteristics of the Bayview Hunter's Point neighborhood with regards to racial/ethnic makeup, based on the results of the 2000 census, have been described by the San Francisco Planning Department in their report "Profiles of Community Planning Areas: San Francisco's Eastern Neighborhoods" (SFPD 2002).

While residents of the Bayview Hunter's Point neighborhood of San Francisco represent 4.4% of the total population of San Francisco, 27% of the City's African American population resides in the Bayview Hunter's Point neighborhood.

Likewise, while 7.6% of the population of San Francisco is African American, 46% of the population of Bayview Hunter's Point is African American. These data are summarized below (SFPD 2002):

	Bayview Hunter's Point		San Francisco	
	Population	Percent	Population	Percent
White	1,986	5.9	338,909	43.6
African American	15,715	46.4	58,791	7.6
American Indian	84	0.2	2,020	0.3
Asian	8,239	24.3	238,173	30.7
Native Hawaiian	1,127	3.3	3,602	0.5
Other	58	0.2	2,580	0.3
Two or more races	929	2.7	23,154	3.0
Hispanic	5,708	16.9	109,507	14.1
Total	33,846	100.0	776,736	100.0

The African American population of San Francisco neighborhoods is also reported by the San Francisco Department of Public Health in "Atlas of HIV/AIDS in San Francisco, 1981-2000" (DPH 2000). In this report, the Bayview neighborhoods (Bayview, Bayshore, Candlestick Park, Hunter's Point and Silver Terrace) are reported to be comprised of 58.8% African Americans. The Western Addition neighborhoods (Western Addition, Fillmore, Hayes Valley and Lower Haight) have the second highest population of African Americans, representing 41.5% of the population of this region. Other San Francisco neighborhoods have African American populations representing 3-11% of the total population (from 2.5% in the Downtown neighborhoods to 10.6% in the Twin Peaks neighborhoods).

Rates of Asthma Reported in California

Asthma Mortality

The California Department of Health Services reported asthma mortality statistics for 1990 to 1997 in the "California Asthma Mortality Chart Book" (DHS 2000). For this reporting period, 4,978 deaths occurred in California due to asthma, representing an age-adjusted mortality rate of 1.88 deaths per 100,000 population. By gender the data were 2.40 deaths per 100,000 for females and 1.89 deaths per 100,000 for males.

For children ages 0-14, the age-adjusted mortality rates in California (in deaths per 100,000) are 0.05 for non-Hispanic whites, 0.34 for African-Americans, and 0.04 for Hispanics.

Mortality rates for children and all ages for the State of California, Alameda County and Sa Francisco County were 2-3 times greater for the African-American population compared to the non-Hispanic white population. Age-adjusted asthma mortality rates for 1990 to 1997, all ages, are shown below (in deaths per 100,000):

	California	Alameda	San Francisco
Total (all races/ethnicities)	1.88	2.34	2.46
Non-Hispanic White	1.72	1.55	1.69
African-American	4.30	5.66	4.11
Hispanic	1.10	-	0.90
Asian/Pacific Islander	2.55	2.92	3.44

Asthma Hospitalizations

The Mann (2000) study cites the California Department of Health Services County Chart Book (1991-1994) which reports that age-adjusted asthma hospitalization rates are 2-3 times higher for African-American children compared to white, non-Hispanic children.

An update to the County Chart Book was published in 2003, with data on asthma hospitalization rates in California counties for 1998 to 2000 (DHS 2003). In California abou 40,000 people are hospitalized annually due to asthma and asthma hospitalization rates are highest in the African-American population, at rates over three times higher than other races, regardless of neighborhood income level (DHS 2003). The age-adjusted annual asthma hospitalization rate for all ages in California for African-Americans is 330.1 per 100,000 compared to 94.8 per 100,000 in non-Hispanic whites and 102.5 per 100,000 in the Hispanic population.

Data on hospitalizations due to asthma in California was obtained from the 1993 California Hospital Discharge file prepared by the California Office of Statewide Health Planning and Development (reported in Fox et. al. 1998). In California in 1993 there were 35,800 hospitalizations for asthma (ages 0-64 years), representing an annual rate of 134 per 100,000 compared to a reported rate of 170 per 100,000 in the U.S. population.

Age-adjusted asthma hospitalization rates in California for 1993 were (per 100,000): 425 f African-Americans, 103 for whites and 130 for Hispanics. The hospitalization rate for African-Americans was elevated above the rate for non-African-Americans regardless of reported residence in urban or rural areas (Fox et. al. 1998). Risk of asthma hospitalizatio was also reported to decrease as median household income increased. The authors concluded that the differential asthma risk observed can be based on two predictors: median household income and race/ethnicity (Fox et. al. 1998).

DHS (2003) also evaluated data on asthma hospitalization rates as they correlate to median household income for 1998-2000. Annual age-adjusted rates were three times higher in African-American males and females compared to non-African-Americans for all income levels. Specifically, in the lowest income level (<$31,233) California African-

American males were hospitalized for asthma at a rate of 354.8 per 100,000 compared to non-African-American males for which the rate was 103.7 per 100,000 (ratio = 3.4). In females the rates were 437.6 and 140.5, respectively (ratio = 3.1). At the highest income level (>$56,930), the rates were 185.7 for African-American males compared to 60.9 for non-African-American males (ratio = 3.0) and 233 for African-American females compared to 71.8 for non-African-American females (ratio = 3.2).

Community Action to Fight Asthma (CAFA 2004b) presents data on hospitalization rates by poverty status in California. Results comparable to the DHS 2003 study are reported, with age-adjusted asthma hospitalization rates increasing with increasing percentage of population below the poverty level in a zip code tabulation area (ZCTA):

% of ZCTA Population	Age-adjusted rate per 100,000	
below poverty line	Children	All Ages
< 20	163.6	96.1
20 - 40	262.7	163.2
> 40	292.7	207.1

Asthma Prevalence

Data on lifetime asthma prevalence in California residents were collected in the 2001 California Health Interview Survey (CHIS; Meng et al. 2003). CHIS conducted phone interviews of over 55,000 households from throughout California between November 2000 and September 2001. The overall response rate was 37%. Pertinent data collected on lifetime asthma prevalence are summarized below:

Lifetime Asthma Prevalence by Age:

Children (< 6 yrs)	8.8%
Children (ages 6-11)	13.7%
Adolescents (ages 12-17)	16.3%
Young adults (ages 18-24)	14.4%
Adults (> 25 yrs)	11.1%
All Ages	11.9%

Lifetime Asthma Prevalence by Age and Gender:

Boys (< 18 yrs)	14.7%
Girls (< 18 yrs)	11.0%
Men (>18 yrs)	10.0%
Women (>18 yrs)	13.0%

Lifetime Asthma Prevalence by Race/Ethnicity:

	Children (ages 1-17)	**Adults (ages >18)**
White	14.3%	13.1%
Hispanic	9.7%	7.0%
Asian	11.7%	9.2%
African-American	21.1%	16.2%

The Behavioral Risk Factor Surveillance System (BRFSS) conducted a telephone survey of the U.S. population (noninstitutionalized residents over age 18) in 2000-2002 (ALA 2004a,

CDC 2004). Results were reported for lifetime asthma (people diagnosed with asthma in t lifetime) and current asthma (people diagnosed with asthma and who had experienced as symptoms within the past 12 months). Results indicated that 12.7% of California adults ha lifetime asthma in 2002 while 6.4% had current asthma in 2002 (ALA 2004a, CDC 2004).

Rates of Asthma Reported in the United States

Asthma Mortality

In 2001 asthma was the cause of death for 4,269 Americans, which represents an age-adjusted asthma mortality rate of 1.5 per 100,000 for all races. A higher mortality rate was seen for females than males: for white females the mortality rate was 1.5 per 100,000 compared to 0.9 per 100,000 for white males; for African-American females the rate was 3.8 per 100,000 compared to 3.2 per 100,000 for African-American males. For African-Americans the asthma mortality rate was three times greater than for whites (3.6 per 100,000 for African-Americans of both sexes compared to 1.2 per 100,000 for whites of both sexes) (ALA 2004a).

Asthma Hospitalizations

National and regional asthma hospitalization data were presented and evaluated in "Asthma in San Francisco" (Mann 2000). National sources cited in this study indicate that African-American children have higher rates of emergency room visits for asthma than do Caucasian American children (1,960 per 100,000 vs. 450 per 100,000, according to the National Ambulatory Medical Care Survey). Additionally, the National Hospital Discharge Survey indicates that, since 1979, asthma hospitalization rates have increased for young children (0-4 years) and for African-Americans. Specifically, the survey indicates that the average hospitalization rate for children (0-4 years) was 343 per 100,000 in 1979-1980. In 1993-1994 that rate had increased to 497 per 100,000. Likewise, the average hospitalization rate for African-Americans in 1979-1980 was 260 per 100,000 and in 1993-1994 the rate had increased to 355 per 100,000.

The American Lung Association (2004) reports that hospital discharge rates for asthma in the United States decreased from 1995 to 2001 for all age groups. In 2001 the hospital discharge rate for African-Americans with asthma was 317 per 100,000, more than 3 times greater than the rate for whites (101 per 100,000).

Asthma Prevalence

Data from the Third National Health and Nutrition Examination Survey, 1988-1994 (NHANES III) has been evaluated and reported in the literature. Researchers have used the information collected by the NHANES III program to estimate asthma prevalence in the United States. Arif (2003) reports that of 18,393 subjects included in the asthma analysis conducted of the NHANES III data, the prevalence of current asthma was 4.5%. The overall prevalence of current asthma in 12,388 children (2 months to 16 years) included in the NHANES III study was 6.7% (Rodriguez 2002).

Results of the Behavioral Risk Factor Surveillance System (BRFSS) conducted in 2000-2002 indicated that 11.8% of US adults had lifetime asthma in 2002 while 7.5% had current asthma in 2002 (ALA 2004a).

The National Center for Health Statistics conducted the National Health Interview Survey (NHIS) in 1982-1996 and 1997-2002 (ALA 2004a). Based on data from 2002 on the national estimate of asthma prevalence, 30.8 million Americans (11,060 per 100,000 population) had been diagnosed with asthma within their lifetime. The national rate for children aged 5-17 years old was reported to be 14,000 per 100,000 (ALA 2004a). In 2002 20 million Americans, including 6.1 million children, experienced asthma symptoms, for rates of 7,180 per 100,000 for all Americans and 9,190 per 100,000 for children (ALA 2004a). Results of the NHIS data are summarized below for current asthma prevalence by age, gender, race/ethnicity (per 100,000):

Females	=	8,100 (≈30% higher in females)
Males	=	6,260
Boys 0-17	=	9,480 (>30% higher in boys)
Girls 0-17	=	7,160
White all ages	=	6,940
African-American all ages	=	9,570 (38% higher than whites)

CHRONIC OBSTRUCTIVE PULMONARY DISEASE (COPD)

Chronic Obstructive Pulmonary Disease or COPD is a group of lung diseases that includes emphysema and chronic bronchitis. COPDs are characterized by air flow obstruction in the lungs that interferes with normal breathing. 82% of deaths due to COPD are caused by cigarette smoking (DHS 1998). According to the American Lung Association, COPD is the fourth leading cause of death in the United States with an age-adjusted death rate of 42.2 deaths per 100,000 population in 2001. COPD is the only lung disease with a higher age-adjusted death rate in Whites than in African-Americans (ALA 2004b):

Age-adjusted death rates due to COPD in the US in 2001 (deaths per 100,000 population):

Females	=	35.9
Males	=	52.8 (1.5 times greater in males)
White	=	44.4 (1.6 times greater in whites)
African-American	=	27.3

In San Francisco in 1990-1995, COPD was the sixth leading cause of death for males and females accounting for 2.7% of deaths in males and 3.1% of deaths in females. The age-adjusted mortality rates for COPD in males and females for 1990-1995 by race/ethnicity in San Francisco are shown below (DPH 1998).

Age-adjusted death rates due to COPD in San Francisco in 1990-1995 (deaths per 100,000 population):

	Males	Females
White	22.7	14.6
African-American	25.2	12.3
Hispanic	5.8	2.5
Asian	18.0	4.7

COPD does not appear among the ten leading causes of death for male and female residents of the Bayview Hunter's Point neighborhood (DPH 1998). Data on the incidence or prevalence of COPDs in San Francisco and Bayview Hunter's Point were not identified in the literature.

DISCUSSION

Asthma rates for adults and children in San Francisco are higher than the asthma target rates recommended by the Healthy People 2000 and Healthy People 2010 National Health Promotion & Disease Prevention Objectives (DHHS 1999, DHHS 2000). Within San Francisco there appear to be ethnic populations and neighborhoods with higher asthma hospitalization rates as compared to other populations and neighborhoods in the City. African-American adults and children in San Francisco have higher asthma hospitalization rates than Hispanics, Asians and whites. The neighborhood with the highe asthma hospitalization rate in adults and children is the Bayview Hunter's Point neighborhood. Results of the community asthma survey indicate that the prevalence rate asthma in children in Bayview Hunter's Point is about twice the national prevalence rate.

The San Francisco Asthma Task Force Act was signed into law in May 2001 and was charged with the responsibility to address the asthma epidemic in San Francisco[1]. Community activists, many from Bayview Hunter's Point, and the San Francisco Board of Supervisors worked together to create the Asthma Task Force and give it the responsibilit to develop a strategic plan for the City of San Francisco to manage and prevent asthma (Asthma Task Force 2003). In June 2003, the Asthma Task Force published the strategic plan, with recommendations made in four sectors (environmental, schools & child care, clinical care and community). The purpose of the strategic plan is to manage and prevent asthma in San Francisco through implementation of the recommendations made by the Asthma Task Force.

There are only a few studies available in the scientific literature that have attempted to lin a specific stationary source of air pollution (such as a power plant) to either the onset or exacerbation of asthma. It is interesting to note that at a gross level, air pollution levels in the United States are lower than they were in the past, yet asthma prevalence has risen substantially over the past 20 years. Despite the fact that the United States and Californi are experiencing an increase in asthma incidence rates of epidemic proportions, a comparative examination of existing background asthma incident rates at a location prior t the construction of a power plant compared to asthma rates afterward would be fraught with scientific uncertainty. Certain air pollutants cause asthma and others exacerbate asthma, but how many cases are caused or exacerbated by air pollution and at what level of pollution is not precisely known. Data specific to asthma rates for specific neighborhoo

[1] Membership in the asthma task force represents the following: environmental epidemiology, tenants' rights, housing management, environmental health, building inspection, public health, schools, child care, parent associations, health education, clinical care (including medicine, respiratory therapy, nursing and pharmacy), community activism, research and health policy.

is non-existent and that for cities and counties limited. According to the President's Task Force on Environmental Health Risks to Children, there is "no national system to collect data from states specifically on asthma" (President's Task Force 1999). Databases often measure different end-points such as hospital admission rates which measure severe reactions or self-reported asthma prevalence in a household. Thus, different databases lead to results portraying different locations as having the "highest" rates of asthma. In fact, DHS (2003) reports that, based on the results of the California Health Interview Survey, the counties with the highest asthma hospitalization rates were not the counties with the highest estimated asthma prevalence rates.

The Agency for Toxic Substances and Disease Registry of the Centers for Disease Control is supporting research on the relationship between environmental exposures and asthma, but it is unknown to what extent, if any, this research will address the source of pollution. California Senator Escutia sponsored legislation which became law (SB-702) in 2001 that intended to create a tracking system to learn where and when diseases occur, what environmental hazards were involved, and what the actual exposure is to these hazards. No results are available to date. The San Francisco Asthma Task Force effort will ultimately provide local data on asthma.

CONCLUSIONS

It is clear that residents of neighborhoods in the southeastern area of San Francisco have increased rates of asthma hospitalizations. This is true for adults and for children. This is also true for children of other neighborhoods of San Francisco, including the Western Addition and Pacific Heights, the Richmond and Sea Cliff, the Sunset and St. Francis Wood areas, as well as Twin Peaks and Diamond Heights. Overall, the rate of adult and child asthma hospitalizations in San Francisco County is about the same as rates in Alameda County and greater than the rates in Contra Costa and Solano counties.

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Figure B-1: San Francisco Zip Code Boundaries

Source:
http://www.tf.org/tf/injuries/map.html

Zip Code	Neighborhood
94102	North Market/Hayes Valley/Tenderloin
94103	South of Market
94104	Financial District
94105	Financial District
94107	Potrero Hill
94108	Chinatown
94109	Nob Hill/Russian Hill/Tenderloin
94110	Mission/Bernal Heights
94111	Embarcadero
94112	Excelsior/Ocean View/Ingleside
94114	Castro/Noe Valley/Corona Heights
94115	Western Addition/Pacific Heights
94116	Parkside/Forest Hill
94117	Haight-Asbury/Hayes Valley
94118	Inner Richmond/Presidio
94121	Richmond/Sea Cliff
94122	Sunset
94123	Marina/Cow Hollow
94124	Bayview/Hunter's Point
94127	St. Francis Wood/West Portal/Miraloma Park
94129	Presidio
94131	Twin Peaks/Diamond Heights/Glen Park
94132	Lake Merced/Merced Manor/Lake Shore
94133	North Beach/Telegraph Hill
94134	Visitacion Valley/Portola

Public Health Appendix C

Cancer in the Southeast Section of San Francisco

September 2004

CANCER IN THE SOUTHEAST SECTION OF SAN FRANCISCO

INTRODUCTION

CEC staff has initiated an extensive review of the environmental and public health impacts of the proposed simple-cycle peaking power plant, the San Francisco Electric Reliability Project (SFERP) proposed by the City and County of San Francisco.

The purpose of this assessment is to determine if increased cancer has occurred in the population located near the proposed power plant, specifically the Bayview Hunters Point neighborhood in the southeast section of San Francisco. This will be accomplished by reviewing the incidence rates of cancers observed in this area with cancers in adults and children observed in populations located in the San Francisco Bay Area, the state, and the nation. Particular emphasis is placed on rates of all cancers, breast cancer and childhood cancers.

ALL CANCERS

United States

Cancer is the second leading cause of death in the United States (following death due to heart disease), and is the cause of 1 of every 4 deaths in the nation (ACS 2004). It has been estimated that in January 2000 there were 9.6 million Americans alive who were either cancer survivors or current cancer patients. The American Cancer Society estimates that one-third of the 563,700 cancer deaths expected to occur in the United States in 2004 will be due to lifestyle factors related to nutrition, physical inactivity, and obesity and thus could be prevented. Also preventable are cancers caused by cigarette smoking and heavy alcohol consumption (ACS 2004).

The top three leading sites of new cancer cases and deaths for males are prostate, lung/bronchus and colon/rectum. For women the top three leading sites are lung, breast and colon/rectum (ACS 2004).

Incidence rates in the U.S. for all cancers in 1996-2000 were highest among African-American males (697 cases per 100,000 population compared to 556 per 100,000 for white males) and white females (432 cases per 100,000 population compared to 406 per 100,000 for African-American females; ACS 2004). Incidence rates for cancers of the colon/rectum and lung were highest for African-Americans (males and females) and for prostate cancer in African-American males. White females had the highest breast cancer incidence rate (141 cases per 100,000 compared to 122 per 100,000 for African-American females; ACS 2004).

Jemal (2004), in the "Annual Report to the Nation on the Status of Cancer, 1975-2001" reported incidence rates in the United States for all cancers and prostate cancer in

males/breast cancer in females by sex and race/ethnicity for 1992-2001, per 100,000:

	Males		Females	
	All Cancers	Prostate Cancer	All Cancers	Breast Cancer
All Races	572	180	412	133
White	574	176	425	138
African-American	719	285	402	120
Asian/PI	396	105	300	92
AI/AN	286	63	229	60
Hispanic	431	143	309	88

PI = Pacific Islander
AI/AN = American Indian/Alaska Native

The data presented above show that African-American males had the highest cancer incidence rates for all cancers and prostate cancer of all ethnic groups and white females had the highest rates for all cancers and breast cancer.

The American Cancer Society reported cancer mortality rates in the U.S. for 1996-2000. African-American males and females had the highest cancer mortality rates for cancers of all sites (356 per 100,000 for African-American males compared to 250 per 100,000 for white males and 199 per 100,000 for African-American females compared to 167 for white females). Mortality rates were highest for African-American males and females for cancers of the colon/rectum, for lung and prostate cancer in males, and breast cancer in females (ACS 2004). In 1999 the death rate due to cancer in African-American men was 257 deaths per 100,000 which can be compared to the rate in whites of 200 per 100,000 (ACS 2003).

Cancer mortality rates were also reported in the "Annual Report to the Nation on the Status of Cancer, 1975-2001" (Jemal 2004). U.S. death rates for all cancers and lung cancer in males/lung and breast cancer in females by sex and race/ethnicity for 1992-2001, per 100,000 were:

	Males		Females		
	All Cancers	Lung Cancer	All Cancers	Lung Cancer	Breast Cancer
All Races	261	82	170	40	29
White	254	80	169	41	28
African-American	365	111	200	39	36
Asian/PI	158	42	103	19	13
AI/AN	168	51	115	26	15
Hispanic	177	41	112	15	18

PI = Pacific Islander
AI/AN = American Indian/Alaska Native

Similar to cancer mortality trends reported by the American Cancer Society (2004), African-American males had the highest cancer mortality rates for all cancers and lung cancer. African-American women also had the highest mortality rates for all cancers and breast cancer while white women and the highest mortality rate for lung cancer (Jemal

2004). Trends in cancer mortality over time have shown decreases in rates for all cancers combined and for many of the leading 15 cancers, an effect which is paralleled by improvement in 5-year relative survival rates for all cancers combined. These trends are not seen, however, in most minority populations (Jemal 2004).

California

Cancer is the second leading cause of death in California. In 1999, 52,877 people died of cancer in the state, which represents an age-adjusted mortality rate of 179.9 cancer deaths per 100,000 persons (Kwong 2001). Statistically significant decreases were seen in the incidence rates of 15 of the most common cancers over the period of 1988 to 1999. Mortality rates for most cancers also decreased from 1988-1999. Kwong and coworkers (2001) report the four leading cancer sites in males in California in terms of incidence and mortality for the period 1995-1999:

	Cancer Incidence in Males	Cancer Mortality in Males
1st	Prostate *(all races)*	Lung *(all races)*
2nd	Lung *(white, African-American, Asian)* Colorectal *(Hispanic)*	Prostate *(white, African-Am, Hispanic)* Liver *(Asian)*
3rd	Colorectal *(white, African-American, Asian)* Lung *(Hispanic)*	Colorectal *(all races)*
4th	Bladder *(white)* non-Hodgkin Lymphoma *(African-American, Hispanic)* Liver *(Asian)*	Pancreas *(white, African-American)* Stomach *(Hispanic, Asian)*

The four leading cancers for females in terms of incidence and mortality in California for the period 1995-1999 are (Kwong 2001):

	Cancer Incidence in Females	Cancer Mortality in Females
1st	Breast *(all races)*	Lung *(white, African-American, Asian)*
2nd	Lung *(white, African-American)* Colorectal *(Hispanic, Asian)*	Breast *(white, African-American, Asian)* Lung *(Hispanic)*
3rd	Colorectal *(white, African-American)* Cervix *(Hispanic)* Lung *(Asian)*	Colorectal *(all races)*
4th	Uterus *(white, African-American, Asian)* Lung *(Hispanic)*	Ovary *(white)* Pancreas *(African-Am, Hispanic)* Stomach *(Asian)*

The age-adjusted cancer incidence rate for 1999 in California was 427.4 cases per 100,000 (Kwong 2001). The American Cancer Society (2004) reports the following cancer incidence and death rates in California for 1996-2000, age-adjusted to the 2000 U.S. standard population:

Cancer incidence rates in California (per 100,000):

	Male	Female
All sites	532.1	412.0
Breast	-	133.8
Colon & rectum	59.9	43.8
Lung & bronchus	76.5	50.4
Non-Hodgkin Lymphoma	22.8	15.2
Prostate	158.1	-

Cancer death rates in California (per 100,000):

	Male	Female
All sites	225.2	160.7
Breast	-	26.5
Colon & rectum	22.2	15.7
Lung & bronchus	63.0	38.8
Non-Hodgkin Lymphoma	10.1	6.6
Prostate	29.4	-

In California in 1995-1999 African-American males had the highest rates of cancer incidence and mortality of the four racial/ethnic groups while the lowest rates were seen in Hispanic and Asian/Pacific Islander males and females. In 1999, the cancer incidence rate for African-American males in California was 623.0 per 100,000, which can be compared to the cancer incidence rate for white males in California (442.3 per 100,000). The cancer mortality rate in African-American males was also higher than in white males (325.3 per 100,000 and 230.8 per 100,000, respectively; Kwong 2001). Cancer incidence and mortality rates by race/ethnicity and sex for California are shown below.

Average annual age-adjusted (2000 US population) incidence and mortality rates per 100,000 population for all cancers by race/ethnicity and sex, California, 1995-1999 (Kwong 2001):

All sites	**Incidence**		**Mortality**	
	Male	**Female**	**Male**	**Female**
All Races	518.0	400.7	224.2	158.2
Non-Hispanic white	545.4	435.7	238.1	169.7
African-American	655.9	393.8	328.4	201.4
Hispanic	367.8	289.9	161.4	115.0
Asian/PI	362.6	294.0	163.9	110.2

San Francisco Bay Area

Cancer incidence and mortality rates in the San Francisco Bay Area are collected by the Greater Bay Area Cancer Registry (GBACR), a state- and federally-funded cancer regist that is operated by the Northern California Cancer Center (NCCC). NCCC publishes annual reports of cancer incidence and mortality in the Greater San Francisco Bay Area.

In 2004, Le and coworkers published data for cancer incidence and mortality for 1988 to 2001, reported by anatomic site and age (Le 2004). In this report, cancer incidence and mortality data are presented for residents of the counties of the greater Bay Area: Alameda, Contra Costa, Marin, Monterey, San Francisco, San Benito, San Mateo, Santa Clara, and Santa Cruz.

Le (2004) reports the four leading cancer sites in terms of incidence and mortality in males in the Greater San Francisco Bay Area for the period 1996-2000:

	Cancer Incidence in Males	Cancer Mortality in Males
1st	Prostate *(all races)*	Lung *(all races)*
2nd	Lung *(white, African-American, Asian)* Colorectal *(Hispanic)*	Prostate *(white, African-American)* Colorectal *(Hispanic)* Liver *(Asian)*
3rd	Colorectal *(white, African-American, Asian)* Lung *(Hispanic)*	Colorectal *(white, African-American, Asian)* Prostate *(Hispanic)*
4th	Bladder *(white)* non-Hodgkin Lymphoma *(African-American, Hispanic)* Liver *(Asian)*	Pancreas *(white)* Stomach *(African-American, Hispanic, Asian)*
5th	Melanoma *(white)* Stomach *(African-American)* Leukemia *(Hispanic)* non-Hodgkin Lymphoma *(Asian)*	non-Hodgkin Lymphoma *(white)* Pancreas *(African-American)* Liver *(Hispanic)* Prostate *(Asian)*

The four leading cancers for females in terms of incidence and mortality in the Greater San Francisco Bay Area for the period 1996-2000 are (Le 2003):

	Cancer Incidence in Females	Cancer Mortality in Females
1st	Breast *(all races)*	Lung *(all races)*
2nd	Lung *(white, African-American)* Colorectal *(Hispanic, Asian)*	Breast *(all races)*
3rd	Colorectal *(white, African-American)* Lung *(Hispanic, Asian)*	Colorectal *(all races)*
4th	Corpus uteri *(all races)*	Ovarian *(whites)* Pancreas *(African-American, Hispanic)* Stomach *(Asian)*
5th	non-Hodgkin Lymphoma *(white, Hispanic)* Pancreas *(African-American)* Thyroid *(Asian)*	Pancreas *(white)* Multiple Myeloma *(African-American)* Ovarian *(Hispanic)* Pancreas *(Asian)*

Lung cancer was the leading cause of death due to cancer in males and females in the Greater San Francisco Bay Area during 1996-2000, representing 26% of all cancer deaths in the region (Le 2003).

The Northern California Cancer Center published a report on colorectal cancer rates in the San Francisco Bay Area between 1988-1999 (NCCC 2002a). Both colon and rectal cancers occurred at higher rates in males than in females during that time period. Colon cancer was also seen at a higher incidence in African-Americans and whites than in Hispanics and Asians/Pacific Islanders (NCCC 2002a).

The San Francisco Department of Public Health published the following cancer mortality rates by race/ethnicity for the City of San Francisco for 1990-1995 (Aragon 1998):

Age-adjusted cancer mortality rates, 1990-1995 in San Francisco, per 100,000:

	Males		Females	
	Lung	Colorectal	Lung	Colorectal
Non-Hispanic white	50.1	16.4	30.5	10.5
African-American	82.2	20.1	36.0	15.9
Hispanic	15.8	9.3	6.9	5.3
Asian	34.8	11.1	13.1	8.9

Bayview Hunters Point

The leading cause of death for Bayview Hunters Point males is homicide, followed by HIV/AIDS, heart disease, lung cancer and stroke (Aragon 1998).

In 1998 the San Francisco Department of Public Health published a report entitled "Cancer incidence among residents of the Bayview-Hunters Point Neighborhood, San Francisco, California 1993-1995" (Glaser 1998). This study compared the observed number of cancers in the neighborhood in 1993-1995 to the number that would have been expected to occur assuming that Bayview Hunters Point residents had the same cancer rates as seen in the Greater Bay Area. Cancer incidence data was obtained from NCCC's Greater Bay Area Cancer Registry and the study controlled for gender, race/ethnicity and age.

The results of the Glaser et al. study indicated that, during 1993-1995, there were no meaningful differences between observed numbers of cancer cases in the neighborhood and expected numbers. The study concluded that: "All the differences between the observed and expected numbers are well within the range of what can be expected to occur through normal fluctuations." Specifically, cancers of the following sites were not shown to be increased in Bayview Hunters Point by this study: breast, cervical, bladder, colon, lung, prostate, rectum, leukemia, non-Hodgkin's lymphoma, cancers among children and adolescents and all cancers combined.

At the request of CEC staff, Le et al. (2004) of the Northern California Cancer Center, using an approach similar to the Glaser study, reviewed four specific cancers diagnosed in residents of the Bayview Hunters Point neighborhood from 1996-2000. The cancers reviewed were breast cancer, cervical cancer, childhood leukemia (children aged 0-19

years old), and brain and other nervous system cancers. In the study, the number of cases observed in the Bayview Hunters Point population was compared to the number of cases expected in that population based on the rate of cancer occurrence reported for the five-county San Francisco Bay Area for that same time period. The five counties of the Bay Area include: Alameda, Contra Costa, Marin, San Francisco and San Mateo counties. The study was designed to control for age, sex and race.

The following results were obtained:

Incidence of selected invasive cancers in Bayview-Hunters Point[1]

	# Observed	# Expected	SIR[2]	99% CI[3]
Breast cancer	72	74.34	0.97	(0.71, 1.31)
Cervical cancer	10	6.39	1.57	(0.69, 3.54)
Childhood leukemia[4]	<5	1.57	-	-
Brain & other nervous system	8	5.50	1.45	(0.58, 3.62)

[1]Bayview-Hunter's Point includes Census Tracts 230.01, 230.02, 230.03, 231.0, 232, 233, 234, 606 and 610 based on Census 2000 census tract boundary definitions.
[2]SIR = Standardized Incidence Ratio = observed number of cases/expected number of cases
[3]If the 99% confidence interval (CI) for the SIR contains 1, then any difference between the observed and expected number is not significant and could have been due to chance.
[4]Cases in children and adolescents aged 0-19.

The study's authors concluded that "Our assessment indicates that during the period 1996-2000, the incidence of childhood leukemia and breast, cervical, and brain cancer in the Bayview-Hunter's Point neighborhood did not differ substantially from that of the entire five-county San Francisco Bay Area." The full study is attached to this report as Attachment 1.

BREAST CANCER

Breast cancer incidence rates have been reported in the literature to increase with increasing socioeconomic status (SES), which probably acts as a proxy for other known breast cancer risk factors such as diet, activity, age at birth of first child, parity and breast feeding.

United States

The American Cancer Society (ACS 2004) has estimated that 215,900 new cases of invasive breast cancer will be diagnosed in women in the United States in 2004, and that 40,580 deaths will occur due to breast cancer.

The breast cancer incidence and mortality rates for African-American and white females in the U.S. for 1995-1999 was reported by the American Cancer Society (2003). The incidence rate for white females was higher than for African-American females (140.9 per 100,000 for white females compared to 123.7 for African -American females). Mortality due

to breast cancer was higher in African-American females: 37.1 deaths per 100,000 compared to 28.2 deaths per 100,000 in white females (ACS 2003).

California

Breast cancer was the most frequently diagnosed cancer in California in 1999 with 21,39 cases of invasive breast cancer and 4,150 cases of in situ breast cancer diagnosed; 4,0 women died of breast cancer in 1999 (Kwong 2001).

Since 1989 the incidence rate of invasive female breast cancer in California has been between 127-131 new cases per 100,000 women per year while breast cancer mortality has decreased by 2.5% per year, from 32.4 deaths per 100,000 in 1988 to 24.5 per 100,000 in 1999 (Kwong 2001).

In California, from 1998-1992, age-adjusted invasive breast cancer incidence rates were significantly higher in white women than in African-American, Asian and Hispanic women (Yost 2001). The effect of socioeconomic status (SES) on breast cancer incidence in the four racial/ethnic groups was studied by Yost and coworkers using 1990 census data an cancer registry data for California. As SES information is not reported to the California Cancer Registry, SES levels were based on SES information at the census block level rather than for individual cases. As evidenced by the results below, SES correlated with breast cancer incidence such that, in general, the higher the SES level, the higher the age-adjusted incidence rate:

Age-adjusted breast cancer incidence rates in California in 1998-1992 (per 100,000):

	White	African-American	Hispanic	Asian/other
SES High	218	178	154	117
SES 4	192	168	136	106
SES 3	183	172	123	92
SES 2	176	146	105	86
SES Low	171	146	84	71
Unadjusted by SES	193	155	109	96

Similar race-specific results are reported by Kwong (2001) in California women. These results are presented below:

Average annual age-adjusted (2000 US population) incidence and mortality rates per 100,000 population for breast cancer by race/ethnicity, California females, 1995-1999:

	Breast Cancer Incidence	Breast Cancer Mortality
All Races	129.4	26.4
Non-Hispanic white	145.5	28.9
African-American	118.1	35.8
Hispanic	83.6	18.0
Asian/PI	88.5	14.4

Heavy alcohol consumption (2 or more drinks per day) and use of hormone replacement therapy (HRT) have been associated with elevated breast cancer risk. The relationship between recent alcohol consumption and breast cancer has been studied in the California Teachers Study Cohort and reported by Horn-Ross (2004). In the California Teachers Study Cohort, Horn-Ross and coworkers report that elevated breast cancer risk was correlated with recent drinking of two or more drinks per day. The greatest effect was observed among heavy drinkers with a history of hormone replacement therapy (HRT) or benign breast disease. Heavy drinkers who used HRT were approximately twice as likely to develop invasive breast cancer as nondrinkers who never used HRT.

San Francisco Bay Area

The Northern California Cancer Center (NCCC 2002b) has reported that in the San Francisco Bay Area, from 1988-1999, the age-adjusted incidence rate for invasive breast cancer was 137 cases per 100,000 women and the in situ breast cancer incidence rate was 29 cases per 100,000. These rates are reportedly similar to rates observed in the Santa Clara region, located to the south of San Francisco (NCCC 2002b). Breast cancer incidence rates (invasive and in situ) were highest in non-Hispanic white females compared to other racial/ethnic groups. Aragon (1998) reported the following mortality rates for female breast cancer by ethnicity in the City of San Francisco for 1990-1995, in cases per 100,000:

Race/Ethnicity	Mortality Rate
All races	18.8
Non-Hispanic White	22.4
African-American	32.0
Hispanic	10.4
Asian	12.2

Le (2003) also reports incidence and mortality rates for invasive breast cancer in females in the Greater San Francisco Bay Area for the period 1996-2000. Rates for three Bay Area counties (Alameda, Marin and San Francisco counties) and the Greater Bay Area are shown below.

Age-adjusted incidence rates for female invasive breast cancer per 100,000 females, 1996-2000:

	Alameda	Marin	San Francisco	Bay Area
All races	131	191	117	135
Non-Hispanic White	151	203	155	157
African-American	109	n/a	105	109
Hispanic	93	135	72	92
Asian/Pacific Islander	92	n/a	83	91

n/a = not available; data not shown for rates based on fewer than 5 cases or for counties with sex- and race-specific population totals less than 50,000

Age-adjusted mortality rates for female breast cancer per 100,000 females, 1996-2000:

	Alameda	Marin	San Francisco	Bay Area

All races	27	32	21	25
Non-Hispanic White	29	33	28	28
African-American	34	n/a	35	32
Hispanic	20	17	12	18
Asian/Pacific Islander	15	n/a	11	13

n/a = not available; data not shown for rates based on fewer than 5 cases or for counties with sex- and race-specific population totals less than 50,000

These data indicate that breast cancer incidence is greatest in white females, with the highest rate occurring in Marin County women. Mortality from breast cancer, however, is highest in African-American women.

The Northern California Cancer Center recently published a report updating breast cancer incidence data in the San Francisco Bay Area (Clarke 2004). This report incorporated the most recent data from the California Cancer Registry, the California Office of Vital Statistics and the California Department of Finance, utilizing revised population estimates based on results of the 2000 census. This report indicates that the revised breast cancer incidence rates for San Francisco County (from 1990 to 2001) are somewhat higher than the rates previously reported for that time period which were based on 1990 census statistics.

Clarke et al. (2004) also showed that the rate of invasive breast cancer in the San Francisco Bay Area is 9% higher than the rate for the rest of California (1997-2001). Average breast cancer rates in San Francisco County in 1988-1989 were virtually the same as rates reported in 2000-2001. For both San Francisco and Marin County, the highest concentration of breast cancer cases was shown to be in women aged 40-69.

As shown below, breast cancer incidence rates are highest among non-Hispanic white women compare to other races (Clarke 2004). Rates in white women in Marin and San Francisco counties are comparable in this report while rates for Hispanic women in Marin County are higher than rates in other areas.

Age-adjusted breast cancer incidence rates for female breast cancer per 100,000 females, 1997-2001:

	Marin	San Francisco	Other Bay Area*	Other California**
Non-Hispanic White	176.6	178.9	165.7	154.2
African-American	97.1	129.4	123.1	128.1
Hispanic	139.1	93.3	107.7	92.2
Asian/Pacific Islander	108.5	88.2	91.8	89.2

*Other Bay Area includes Alameda, Contra Costa, San Mateo and Santa Clara counties
**Other California includes other counties in California excluding the Bay Area

The Clarke (2004) study also showed that the breast cancer mortality rates in the regions evaluated are comparable:

Age-adjusted mortality rates for female breast cancer per 100,000 females, 1997-2001:

	Marin	San Francisco	Other Bay Area*	Other California**
Non-Hispanic White	29.8	31.9	28.5	28.4
African-American	37.6	42.9	34.4	36.1
Hispanic	15.7	16.0	20.8	18.5
Asian/Pacific Islander	16.4	12.2	13.9	14.7

*Other Bay Area includes Alameda, Contra Costa, San Mateo and Santa Clara counties
**Other California includes other counties in California excluding the Bay Area

Wrensch (2003) reported the following age-adjusted invasive breast cancer rates in white, non-Hispanic women, averaged over 1995-1999: Marin County - 199 per 100,000, the rest of the San Francisco Bay Area - 155 per 100,000 and the United States - 144 per 100,000.

John and coworkers (2003) conducted a case-control study of patients diagnosed with invasive breast cancer between 1995 and 1998 in five Bay Area counties (San Francisco, San Mateo, Santa Clara, Alameda and Contra Costa Counties). Lifetime histories of moderate and vigorous physical activity were collected from cases and controls (types of activities included recreational activity, walking, bicycling, household and outdoor chores and occupation). Results of the study indicate that physical activity reduces the risk of breast cancer with similar reductions for moderate and vigorous activities.

Marin County

Elevated breast cancer rates have been reported in Marin County, California since the early 1990s. Marin County is unique in that its population is relatively homogenous, predominantly non-Hispanic white and affluent. Invasive breast cancer rates in Marin County have increased since 1990 at an average reported rate six times greater than in comparison areas (Clarke 2002).

For women aged 45-64 years the breast cancer incidence rate increased by an annual average of 6.7% between 1990-1999 (Clarke 2002). Similar results were reported by Prehn (2002) for women aged 45-64 years in Marin County from 1991-1997 who exhibited an estimated annual percentage change (EAPC) of 8% (rates for the rest of the Bay Area were relatively constant over the same time period).

Between 1995 and 1999, the average annual age-adjusted breast cancer incidence rates for Marin County women were at least 20% higher than rates observed in other counties of the San Francisco Bay Area. Marin County rates were also 38% higher than rates for other urban counties combined. Average incidence rates were 58% higher for Marin women 45-64 years old than the women of the same age in other San Francisco Bay Area counties, and 72% higher than other urban California counties (Clarke 2002).

Breast cancer mortality rates were 25% higher in Marin County women than in women of other Bay Area and urban California counties (averaged over 1995-1999; Clarke 2002). In Marin women aged 45-64 the increase in breast cancer mortality rate was

reported to be 1.9% per year from 1995-1999. In contrast, mortality rates in women of other Bay Area and urban California counties decreased from 3 to 4.5% over the same time period for the same age group (Clarke 2002).

Clarke (2004) updated breast cancer incidence rates for Marin County, based on 2000 census data. In the Clarke report, the revised breast cancer incidence rates for Marin County (from 1990 to 2001) are somewhat lower than the rates previously reported for that time period which were based on 1990 census statistics.

Clarke et al. (2004) also showed that, in 1997-2001, the rate of invasive breast cancer in Marin County was 6% higher than the rest of the Bay Area and 15% higher than the rest of the state. Average breast cancer rates in Marin County in 2000-2001 were 12.4% higher than rates reported in 1988-1989. In other parts of the Bay Area the 2000-2001 rates were 5.9% higher and in other parts of California the 2000-2001 rates were 6.5% higher, compared to rates in 1988-1989.

Breast cancer incidence and mortality rates for Marin County reported by Clarke (2004) are shown in the previous section of this report on breast cancer in San Francisco. Note that, contrary to other reports previous to Clarke 2004, breast cancer mortality in Marin County is similar to that reported for other regions.

In 1998, Prehn and West compared Marin cancer rates with rates of similarly wealthy census blocks using cancer registry data and 1990 census block data (a census block is smaller than a census tract and contains approximately 1,000 individuals). Marin County rates and risk factors were compared to rates and risk factors in census blocks located in 24 other California counties. In 1988-1992 Marin County had an age-adjusted breast cancer incidence rate of 119 cases per 100,000 women per year, compared to 109 per 100,000 for all other counties combined. Prehn and West (1998) reported that census blocks that had characteristics most similar to Marin County had breast cancer incidence rates like rates seen in Marin. Likewise, census blocks with high levels of known breast cancer risk factors had higher breast cancer rates; this effect was seen in Marin County and in other parts of California. These results indicate that the high rates of breast cancer seen in Marin County are probably associated with characteristics of the unique population of the county rather than with characteristics of the county itself. The specific population characteristics evaluated included: race, urban status, parity, income, education, occupation and poverty level.

In a 1997-1999 case-control study of breast cancer risk factors in Marin County, the following factors were more likely to occur in cases than controls (Wrensch 2003):

- Premenopausal
- Never to have used birth control pills
- Lower highest lifetime body mass index
- Four or more mammograms in 1990-1994
- Beginning drinking after age 21
- On average drinking 2 or more drinks/day

- Highest quartile of pack years of cigarette smoking
- Raised in organized religion

In this same study, the following factors did not differ significantly between cases and controls:

- Having a first degree relative with breast cancer
- History of benign breast biopsy
- Previous radiation treatment
- Age at menarche
- Parity
- Use of hormone replacement therapy
- Age of first living in Marin
- Total years lived in Marin

Thus, this study did not identify an association between breast cancer incidence and how many years women live in Marin County, an association that would be expected if there was something specific to Marin County that caused breast cancer (other than the socioeconomic status of the population).

Current research indicates an association between the elevated breast cancer rates in Marin County and a high concentration of women with known breast cancer risk factors including low parity, later age at birth of first child, education and affluence.

Ongoing research in Marin County includes a case control study of exposures during adolescence; projects to identify environmental exposures unique to the county; studies to elucidate the relationship between socioeconomic status and breast cancer; and research on the contributions of alcohol consumption and HRT to elevated breast cancer rates, among other studies.

Bayview Hunters Point

In the 1998 study of cancer incidence in Bayview Hunters Point, the San Francisco Department of Public Health also evaluated observed versus expected cases of breast cancer in women in 1993-1995 (Glaser 1998). The results showed that 52.5 breast cancers cases were expected based on the population of the Bayview Hunters Point neighborhood and Bay Area breast cancer incidence rates. However, only 45 breast cancers were observed. Likewise, 5.3 cases of cervical cancer were expected and 6 were observed.

In the 2004 study of breast and cervical cancer incidence in the Bayview Hunters Point, the Northern California Cancer Center reported the observed versus expected cases of these two cancers for 1996-2000 (Le 2004). The results showed that 74.34 breast cancer cases were expected based on the population of the Bayview Hunters Point neighborhood and Bay Area breast cancer incidence rate for that time period. However, only 72 cases were observed in the Bayview Hunter's Point.

For cervical cancer, 6.39 cases were expected but 10 cases were observed. The standardized incidence ratio is 1.57 with a 99% confidence interval of (0.69, 3.54). Since the 99% CI contains 1, the difference between the observed and expected number is not significant and could be due to chance.

These two studies contradict a previous study conducted by the same department, which showed elevated breast and cervical cancer incidence rates in women of the Bayview Hunters Point neighborhood during 1988-1992. The authors ascribed some of the increase in cancer incidence found in the late 1980s to increased breast cancer screening during that period rather than due mostly to an actual increase in cancer incidence.

CHILDHOOD CANCER

Childhood cancer does not encompass one single disease but rather represents a wide group of different malignancies that vary by histology, origin site, race, sex and age.

United States

Cancer is the leading cause of death by disease in children in the U.S. For children and adolescents in the U.S., cancer is the fourth ranked cause of death after unintentional injuries, homicide and suicide (Ries 1999).

Nationwide it is reported that leukemia, central nervous system tumors and lymphoma comprise 57% of childhood cancers (Ries 1999). On average, the nationwide childhood cancer incidence rate is 10 to 20 cases/100,000 children (NCI 2002).

The American Cancer Society (ACS 2004) estimates that 9,200 new cases of childhood cancer will occur in the United States among children ages 0-14 in 2004. 1,510 deaths are estimated, approximately one-third of which will be from leukemia in children. In 2001, 8,600 children (defined as <15 years of age) in the United States were diagnosed with cancer. About 1,500 children died from the disease that year (NCI 2002). In 1999 the death rate of African-American children aged 1-14 was 2.7 per 100,000 which is essentially equivalent to the death rate reported in white children, 2.6 per 100,000 (ACS 2003).

Survival rates for children with cancer have improved dramatically in recent years. Boys 1995-2000 have shown an absolute survival increase of 20% over boys in 1975-1979 while the increase observed in girls is 13% (Jemal 2004).

The causes of cancer in children are unknown. Consistent findings have not been reported that link environmental exposures or parental occupations to childhood cancer. Only a few known conditions or agents have been determined to explain a small percentage of specific cancers in children (Down syndrome, ionizing radiation from accidents or radiation therapy, certain chemotherapeutic agents, AIDS, specific genetic syndromes; NCI 2002).

The National Cancer Institute's SEER program (Surveillance, Epidemiology and End Results) has published detailed information on the incidence of childhood cancer in the

United States (Ries 1999). Population-based data were compiled and presented by histologic type and primary site. The following age-specific cancer incidence rates, per 100,000 population, for all races for 1986-1995 were presented:

	All Sites	Acute Lymphoblastic Leukemia (ALL)	Acute Myeloid Leukemia (AML)	CNS Tumors (total)
Male & Female:				
<5 yrs old	20.0	5.8	1.0	3.6
5-9 yrs old	11.0	3.0	0.5	3.2
10-14 yrs old	11.7	1.8	0.6	2.5
15-19 yrs old	20.2	1.3	0.9	2.0
Male:				
0-14 yrs old	15.0	3.7	0.7	3.3
15-19 yrs old	20.4	1.8	0.8	2.3
Female:				
0-14 yrs old	12.9	3.1	0.7	2.8
15-19 yrs old	20.0	0.8	0.9	1.7

California

Accidents are the leading cause of death in California's children. The second leading cause of death in children is cancer, with leukemia, central nervous system tumors and lymphomas being the most common types of cancer diagnosed in children and teenagers in California. Together these three types of cancer comprise approximately 60% of all cancers diagnosed in children in the state (Campleman 1999). During the period of January 1, 1988 to December 31, 1994 the average annual age-adjusted rate of invasive primary cancer cases in children in California was 14.2 cases/100,000 children under age 15 and 15.4 cases/100,000 children under age 20 (Campleman 1999). According to the American Cancer Society (2001), 1100 children less than 15 years of age and ~400 young adults (15 to 19 years of age) are diagnosed with cancer each year in California.

Campleman (1999) reports the following average annual, age-specific and age-adjusted incidence rates for all cancer sites and for leukemia, all races combined in children in California, for 1988-1994. Rates are reported per 100,000 population.

All Cancer Sites (rate per 100,000):

	Male		Female	
	Count	Rate	Count	Rate
0-4 yrs old	2036	21.6	1608	17.9
5-9 yrs old	955	11.7	841	10.8
10-14 yrs old	934	12.7	829	11.8
15-19 yrs old	1486	19.5	1300	18.7

Leukemia (rate per 100,000):

	Male		Female	
	Count	Rate	Count	Rate
0-4 yrs old	764	8.1	614	6.8
5-9 yrs old	379	4.7	306	3.9
10-14 yrs old	242	3.3	188	2.7
15-19 yrs old	259	3.4	157	2.3

San Francisco Bay Area

Le (2003) reports the following average annual, age-specific incidence rates in the greater San Francisco Bay Area for all cancer sites and for leukemia in children. Rates are reported per 100,000 population by sex, for all races combined, for 1996-2000:

All Cancer Sites (rate per 100,000):

	Male		Female	
	Count	Rate	Count	Rate
0-4 yrs old	269	22.3	212	18.4
5-9 yrs old	139	11.2	114	9.6
10-14 yrs old	143	13.3	119	11.6
15-19 yrs old	210	21.2	184	19.6

Leukemia (rate per 100,000):

	Male		Female	
	Count	Rate	Count	Rate
0-4 yrs old	110	9.1	87	7.6
5-9 yrs old	57	4.6	41	3.5
10-14 yrs old	29	2.7	32	3.1
15-19 yrs old	29	2.9	22	2.3

The Northern California Cancer Center reported in 2000 (NCCC 2000), that each year in the Bay Area about 250 children are diagnosed with cancer. NCCC (2000) evaluated patterns of childhood cancer incidence in children younger than 20 years old in the Greater Bay Area (Alameda, Contra Costa, Marin, Monterey, San Benito, San Francisco, San Mateo, Santa Clara and Santa Cruz counties). The results of the analysis indicated that the incidence rates of childhood cancer were greater in boys than girls and greater in whites and Hispanics than African-Americans and Asians/Pacific Islanders. Rates reported for the Bay Area were similar to rates reported for children in the state.

Bayview-Hunters Point

Childhood cancer incidence in the Bayview-Hunters Point (BVHP) neighborhood was evaluated by Glaser et.al. in 1998. The report was prepared by: Eva Glaser, M.D. of the Cancer Surveillance Section, California Department of Health Services, Martha Davis

and Rita Leung of the Northern California Cancer Center, and Tomas Aragon, M.D. of the San Francisco Department of Public Health.

In this study, cancer incidence was reviewed in BVHP for 1993-1995 using information obtained from NCCC's Greater Bay Area Cancer Registry. Cancer rates and population estimates were specific for gender, race/ethnicity and age. The data were evaluated by comparing the number of cancers observed in the population during 1993-1995 with the average number of cancers that would have been expected to have occurred if BVHP residents had the same cancer rate as residents of the Bay Area as a whole. For childhood and adolescent cancers, fewer than 5 cases were observed in BVHP and fewer than 5 cases were expected based on Bay Area rates. Incidence of fewer than 5 cases is not statistically significant and therefore should not be included in an analysis of cancer incidence; in fact, most studies would not even include information on less than 20 cancer cases (Reiter 2003). In order to adequately evaluate a population, a greater number of residents is required or many more years of data is needed for statistically significant results.

In 2004 a similar study was conducted by the Northern California Cancer Center (Le 2004) which reported that for 1996-2000 fewer than 5 childhood leukemia cases were observed in the Bayview Hunters Point neighborhood while 1.57 cases were expected based on childhood leukemia cancer rates in the Greater Bay Area. The exact number of cases reported in the Bayview Hunters Point neighborhood is not provided in order to protect the privacy of the patients.

The authors of the Glaser study concluded that the observed numbers of cancers among children and adolescents "were not meaningfully increased over the expected number." Additionally, the Glaser study cited a similar 1988-1992 study, which likewise did not show an elevated incidence of childhood cancer compared to Bay Area and San Francisco rates. The results of the Le 2004 study also support the findings and conclusions of the Glaser study.

DISCUSSION

Certain cancer incidence and mortality rates for adults and children have been presented in this report for the United States, California, the Greater San Francisco Bay Area and the Bayview Hunters Point neighborhood.

Cancer incidence rates for areas smaller than the county level are generally not available. The Northern California Cancer Registry conducts cancer incidence analyses at the county level (Unger Hu 2003). The Glaser (1998) and Le (2004) reports on cancer incidence in BVHP are the only reports specific for the population of the southeastern region of San Francisco.

Dr. Mitchell Katz, Director of San Francisco Department of Public Health, addressed a meeting of the Southeast Community Facility Commission on July 28, 2004. Dr. Katz reported that rates of breast, prostate, lung and cervical cancers in the Bayview Hunters Point community are the same as rates three years ago. Dr. Katz indicated that, since there has been no change in environmental toxicants in the area in the past three years,

the disparity in health (cancer and asthma) between the African American community and other ethnic communities of San Francisco is "due mainly to poverty and social/environmental factors". A greater commitment on the City's part in terms of environmental justice issues was recommended by Dr. Katz.

All Cancers

Cancers of the following sites were not shown to be increased in Bayview Hunters Point by the Glaser (1998) study: breast, cervical, bladder, colon, lung, prostate, rectum, leukemia, non-Hodgkin's lymphoma, cancers among children and adolescents and all cancers combined. Likewise, cancers of the following sites were not shown to be statistically significantly increased by the Le (2004) study: breast cancer, cervical cancer, childhood leukemia, and brain and other nervous system cancer.

Breast Cancer

Breast and cervical cancer incidence rates in women of the Bayview Hunters Point neighborhood were not elevated above the rates expected for this population based on gender-, race/ethnicity-, and age-controlled rates observed in the San Francisco Bay Area.

Childhood Cancer

The population of children and adolescents under the age of 19 for the four zip codes that comprise the southeastern area of San Francisco is 38,471, based on the 2000 U.S. census[2]. Applying the childhood cancer incidence rate reported for male and female children in the U.S. of approximately 20 cases/100,000[3] results in an equivalent expected childhood cancer count of 8 cases for the population of the southeastern area of San Francisco. Application of this rate to the child population of the BVHP neighborhood would result in an expected childhood cancer count in that area of 2.2 cases, which is consistent with the results reported by the Glaser 1998 and Le 2004 studies (<5 cases). Therefore, these results indicate that the incidence of childhood cancer in the southeastern section of San Francisco, and particularly in the Bayview-Hunter's Point neighborhood, has not been shown to be increased above the expected incidence rate of childhood cancer.

Racial Disparities

The cancer incidence and mortality rates presented in this report have demonstrated the disparities that exist in this country regarding cancer incidence and deaths in minority populations, particularly African-American males and females. The American Cancer Society, in its report titled "Cancer Facts and Figures for African-Americans 2003-2004," has indicated that these disparities may be based on socioeconomic differences and unequal access to medical care. Specifically, the American Cancer Society states that the higher cancer incidence and mortality rates seen in African-Americans compared to whites may be due to issues of poverty, treatment disparities, reduced access to medical care, and diagnosis at a more advanced stage of disease,

[2] The following population statistics for children and adolescents under the age of 19 were obtained from the 2000 U.S. census: zip code 94107, Potrero Hill, 2,094 children; zip code 94110, Mission/Bernal Heights, 14,760 children; zip code 94124, BVHP, 11,046 children; zip code 94134, Visitacion Valley, 10,571 children (Census Bureau 2003).

[3] The rate of 20 cases/100,000 population is consistent with the data presented for male and female children in California and the Greater San Francisco Bay Area.

which has been shown to occur in a higher proportion of African-Americans compared to whites.

CONCLUSION

Available data show that cancer incidence rates in the population located near the proposed SFERP power plant in the southeast part of San Francisco are not elevated above those found in the general population. The observed cancer incidence rates for all cancers, breast cancer and childhood cancer for the Bayview-Hunters Point neighborhood are not greater than the rates expected for that population based on the rates reported for the greater San Francisco Bay Area, the state, and the nation.

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ATTACHMENT 1

Cancer concern in San Francisco County:
Report on incidence of cancer in Bayview-Hunter's Point
from the Greater Bay Area Cancer Registry
August 11, 2004

INTRODUCTION

In response to a request from a consultant for the California Energy Commission, the Greater Bay Area Cancer Registry (GBACR), part of the Northern California Cancer Center in Union City, California, has completed a review of the incidence of selected cancers (cancers of the breast, cervix, brain, and childhood leukemia) occurring in the Bayview-Hunter's Point neighborhood in San Francisco County. This cancer assessment report will be included in the public health assessment for the proposed San Francisco Electric Reliability Project (SFERP), which is proposed to be located in the Bayview-Hunter's Point section of San Francisco.

METHODS

The Greater Bay Area Cancer Registry (GBACR) collects and manages information on persons diagnosed with cancer. These data are obtained according to state law from physicians, hospitals, and other cancer treatment facilities, which are required by the state to report all cancer cases to the registry. Cancer data in the San Francisco Bay Area (Alameda, Contra Costa, Marin, San Francisco, and San Mateo counties) are available from 1973 onward; data are currently complete through 2001. In this report, we examined reviewed the incidence of childhood leukemia (ages 0-19) and breast, cervical, and brain cancers in the Bayview-Hunter's Point neighborhood during the period 1988-2000.

To determine the number of cases that were diagnosed among residents of a certain geographic area, the GBACR collects information on cancer patients upon diagnosis, including his/her address. However, the data are limited to the address at the time of diagnosis and do not include a residential history. Since the development of cancer is a multi-step process and there is a long time between the start of tumor development and a clinically diagnosable cancer, some former residents will have been diagnosed with cancer after moving out of the area, and some new residents will be diagnosed shortly after moving into the area. However, if there were a major increase in cancer among people who have lived in the area for a long period of time, it is likely to be seen in this type of investigation.

The Bayview-Hunter's Point neighborhood was defined using Census 2000 census tract boundary definitions and included the following census tracts: 230.01, 230.02, 230.03, 231.01, 231.02, 232, 233, 234, 606, and 610 (see attached maps). To determine if the occurrence of specific cancers has been unusual in this neighborhood, we compared the number of cases for these cancers (the observed number) in the region of concern with the number that would be expected to occur if these neighborhood residents had the same rate of cancer occurrence as the entire five-county San Francisco Bay Area. To determine the expected number of cancers, we applied the average annual

incidence rate of cancer from the reference region (San Francisco Bay Area) to the Census 2000 population in Bayview-Hunter's Point by age, race, and sex. This number was multiplied by 5 to reasonably estimate the number of expected cancers during the time period 1996-2000.

RESULTS

Table 1 shows the estimate of the number of breast, cervical, brain, and childhood leukemia cases expected to be diagnosed in Bayview-Hunter's Point and the number of cases actually diagnosed (observed number) for the period 1996-2000. Counts less than five are not shown due to confidentiality of small numbers. The expected and observed numbers can be compared directly using the standardized incidence ratio (SIR). If the 99% confidence interval for the SIR contains 1, then any difference between the observed and expected number is not significant and is likely due to chance. As shown in Table 1, all confidence intervals included 1, indicating that there was no significant difference in cancer incidence between the Bayview-Hunter's Point neighborhood and the rest of the San Francisco Bay Area during this time period for these specific cancers.

Table 1. Incidence of selected invasive cancers in Bayview-Hunters Point[1] San Francisco, CA

	1996-2000			
Type of Cancer	Observed number	Expected number	SIR[2]	99% CI[3]
Breast (female)	72	74.34	0.97	(0.71, 1.31)
Cervix	10	6.39	1.57	(0.69, 3.54)
Childhood leukemia[4]	< 5	1.57	-	-
Brain and other nervous system	8	5.50	1.45	(0.58, 3.62)

[1]Includes Census Tracts 230.01, 230.02, 230.03, 231.01, 231.02, 232, 233, 234, 606, and 610 based on Census 2000 census tract boundary definitions.
[2]SIR = Standardized Incidence Ratio = Observed number of cases/Expected number of cases.
[3]If the 99% confidence interval (CI) for the SIR contains 1, then any difference between the observed and expected number is not significant and could have been due to chance.
[4]Cases in children and adolescents aged 0-19.

CONCLUSIONS

Our assessment indicates that during the period 1996-2000, the incidence of childhood leukeumia and breast, cervical, and brain cancer in the Bayview-Hunter's Point neighborhood did not differ substantially from that of the entire five-county San Francisco Bay Area.

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Public Health Appendix D

Childhood Mortality in San Francisco

September 2004

LEADING CAUSES OF CHILDHOOD MORTALITY IN THE UNITED STATES

The Federal Interagency Forum on Child and Family Statistics presented data on infant and child mortality rates in the United States in their publication "America's Children In Brief: Key National Indicators of Well-Being, 2004" (Forum 2004). Data presented indicate that the six leading causes of death in children in the US ages 1-14 are: unintentional injuries, cancer, birth defects, homicide, heart disease and pneumonia/influenza (Forum 2004, UCSF 2003).

CHILDHOOD MORTALITY BY RACE/ETHNICITY IN THE UNITED STATES

Nationwide, child death rates by race/ethnicity are highest in non-Hispanic African American children (Forum 2004):

Age	< 1	1 - 4	5 - 14	15 - 19	
Gender				Males	Females
Non-Hispanic African American	13.5	47.5	23.3	130.4	40.8
Non-Hispanic White	5.7	30.1	17.7	86.1	39.6
Hispanic	5.4	30.6	14.7	92.0	31.1
Asian/Pacific Islander	4.7	22.3	12.2	52.1	23.3

Unintentional injury and homicide rates recorded in 1999-2000 are also highest in non-Hispanic African American children (ages 6-11) in the US (UCSF 2003):

	Deaths per 100,000 population	
	Unintentional injury	Homicide
Non-Hispanic African American	11.7	1.5
Non-Hispanic White	6.1	0.54
Hispanic	5.4	0.86
Asian/Pacific Islander	3.3	0.41
American Indian/Alaska native	11.3	0.86

Leading Causes of Childhood Mortality in San Francisco

The San Francisco Department of Public Health reported "The Health and Well-Being of Children and Youth in San Francisco, 1998" (DPH 1998). From 1990 to 1995 there were 1,027 deaths in San Francisco in children ages from birth to 24 years old. The five leading causes of death and numbers of death, by age, for children in San Francisco in 1990-1995 are ranked below:

	Number of Deaths
Infants age 0-1	
1. SIDS	85
2. Congenital anomalies	70
3. Birth asphyxia/trauma	43

4. Growth/gestation/low birthweight 14
5. Pneumonia 8

Children age 1-4

- Congenital anomalies 16
- Homicide 7
- Motor vehicle-traffic 5
- Fires, unintentional 4
- HIV/AIDS 3

Children age 5-14

1. Motor vehicle-traffic 15
2. Congenital anomalies 8
3. Homicide 7
4. Leukemia 5
5. Brain Cancer 4

Youths age 15-24

1. Homicide 157
2. Suicide 79
3. Motor vehicle-traffic 78
4. HIV/AIDS 30
5. Drug poisoning, unintentional 22

San Francisco Demographics

Duh et al. (1999) reported the following population statistics by race/ethnicity for San Francisco's general population and youth population ages 10-24 years old:

	Demographics of San Francisco	
	General Population	Youth
African-American	10%	14%
White	40%	23%
Latino	16%	21%
Asian	33%	42%

The San Francisco Planning Department reports that 27% of San Francisco's African American population resides in Bayview Hunters Point (SFPD 2002). In the Bayview Hunters Point, 46% of the residents are African American, 24% are Asian, 17% are Hispanic and 6% are white.

Infant Mortality Rates in San Francisco

Overall, San Francisco's infant mortality rate for 1998 was 5.3 deaths per 1,000 live births (Bosley and Evans 1998). This rate is better than the Healthy People 2000 objective of 7 deaths per 1,000 live births but greater than the Healthy People 2010 objective of 4.5 deaths per 1,000 live births. African-Americans had the highest infant mortality rate in San Francisco in 1998 (Bosley and Evans 1998) and the highest percentage of low birth weight babies in 1998 (Harris et al. 2000):

Infant Mortality in San Francisco in 1998 (Bosley and Evans 1998) and Percentage of Low Birth Weight Babies in 1998 (Harris et al. 2000), by race/ethnicity

	Infant deaths per 1,000 live births	Low Birth Weight
Non-Hispanic African American	14.8	13.7 %
Non-Hispanic White	4.4	7.1 %
Hispanic	2.9	6.1 %
Asian	4.0	5.9 %

Infant and childhood mortality rates specific to the Bayview Hunters Point and Potrero Hill neighborhoods of San Francisco were not identified in the literature.

Conclusions

In 1998 the overall infant mortality rate in San Francisco was lower than the Healthy People 2000 objective for infant mortality (5.3 deaths in SF per 1,000 live births versus the objective of 7 deaths per 1,000 live births). Infant and childhood mortality rates specific to the Bayview Hunters Point neighborhood of San Francisco were not identified in the literature.

Within the African American population of San Francisco, however, the infant mortality rate was more than 3 times greater than the rate reported in white residents and 5 times greater than the rate in Hispanic residents. This trend is consistent with the Forum study (2004) that reports child death rates in the U.S. by race/ethnicity are highest in non-Hispanic African American children. Since nearly half of the Bayview Hunters Point residents are African American (SFPD 2002), it seems likely that an increased rate of infant/childhood mortality would probably be observed in this population, as it is observed in the entire City of San Francisco and nation-wide.

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Public Health Appendix E

Staff's Health Risk Assessment and Cumulative Risk Assessment for SFERP

June 20, 2005

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INTRODUCTION

A risk assessment was conducted for the proposed San Francisco Electric Reliability Project (SFERP). A cumulative risk assessment was also conducted for emissions from SFERP and emissions from 20 other facilities located in the southeastern region of San Francisco, for a total of 50 sources evaluated.

This report presents the approach that was used, assumptions that were made, and results of the risk assessments. Facility-specific values were used wherever available.

DISPERSION MODELING

Dispersion modeling and health risk assessment were conducted using the California Air Resources Board's "Hot Spots Analysis and Reporting Program," HARP version 1.1 (build 23.02.10). The program was obtained from the website of Dillingham Software Engineering, Inc. (http://www.dillinghamsoftware.com)

Modeling was conducted using coarse and fine grids and representative meteorology (Potrero Power Plant 1992 meteorological data set).

For properties which had enough information on existing buildings (provided by BAAQMD), building dimensions were included in the analysis for building downwash effects. These facilities include: SFERP, Mirant Potrero, PG&E Hunters Point, Southeast Water Pollution Control Plant, Bell Cleaners, One-Hour Martinizing and Vermont Cleaners. Properties for which building dimensions were not available include: Gonzalez Steel Drum Company, San Francisco Petroleum Company, VIP Litho and 10 gasoline dispensing service stations.

The data for each facility stack evaluated in the risk analyses are summarized in Table 1. Data are listed for all 50 sources at the 20 facilities included in the cumulative risk analysis. Any assumptions that were made in the analysis due to lack of information are indicated by a shaded background (which appears yellow on screen and if printed in color).

Emissions of toxic air contaminants from each facility are listed in Table 2. For SFERP, emissions were obtained from the AFC for the three gas turbines and two cooling towers. Maximum impacts were modeled for this facility based on Turbine Case 6 (worst case for all impacts; Table 8.1B-3 of the AFC). Emissions for all other facilities were obtained from information provided by BAAQMD.

HEALTH RISK ASSESSMENT

Point estimate risk analysis was conducted using the Derived (OEHHA) Method option. Risks and hazards were calculated under the residential exposure scenario, unless otherwise noted. Cancer risk, noncancer chronic hazard and noncancer acute hazard were determined and are presented in this report, along with isopleths for each scenario. The maps upon which the risk isopleths are superimposed are accurate to within +/- 10 to 20 m.

RESULTS

Dispersion modeling and risk assessment were conducted for source emissions under the following scenarios:

- all sources at SFERP (3 combustion turbines and 2 cooling towers)
- SFERP combustion turbines only
- SFERP cooling towers only
- 20 facilities in southeastern San Francisco, including SFERP (50 sources)

ALL SOURCES AT SFERP

Dispersion modeling using a coarse grid and then a fine grid was conducted for emissions from SFERP using the HARP program. First a coarse grid of 5000 m with 200 m resolution was run, centered on SFERP (2,748 receptors). Then, to better define the risks near the SFERP, a fine grid was run of 1500 m, 25 m resolution centered on the proposed location of SFERP (14,788 receptors).

Results of this analysis are presented in Table 3 and in Figures 1, 2 and 3 for coarse grid modeling and Figures 4, 5 and 6 for fine grid modeling.

Results of the coarse grid dispersion modeling indicate that the off-site PMI (point of maximum impact) for cancer risk and chronic noncancer hazard index (HI) due to emissions from all sources at SFERP is located in the San Francisco Bay. The results of the fine grid dispersion modeling indicate that the PMI for cancer risk is located to the northeast of the facility boundary.

Table 3 lists the total maximum cancer risk, chronic HI and acute HI which occur at three separate locations in the San Francisco Bay, from the coarse grid modeling. Results for the fine grid modeling are also presented, as well as risks and hazards at the facility fenceline (assumed to be the nearest workplace and modeled under the worker exposure scenario), the nearest residence (located approximately 1,600 feet from the facility on the northeast corner of Minnesota and Cesar Chavez streets), the nearest sensitive receptor (located approximately 550 feet north of the facility at the Warm Water Cove Public Access Park), and the maximally exposed sensitive receptor.

SFERP COMBUSTION TURBINES ONLY

Emissions from the combustion turbine generators and the cooling towers at SFERP were modeled separately.

Dispersion modeling using a coarse grid and then a fine grid was conducted for emissions from SFERP combustion turbines using the HARP program. First a coarse grid of -2000 m east to 5000 m east with 200 m resolution and -2500 m north to 2500 m north with 200 m resolution was run, centered on SFERP (1,083 receptors). Then, to better define the risks near the SFERP, a fine grid was run of -2000 m east to 2500 m east, 20 m resolution and -2000 m north to 2000 m north with 20 m resolution, centered on the proposed location of SFERP (45,573 receptors).

Results of this analysis are presented in Table 4 and in Figures 7, 8 and 9 for fine grid modeling. Results of the fine grid dispersion modeling indicate that the cancer and chronic HI PMI under this scenario is located in the San Francisco Bay. Table 4 lists the total maximum cancer risk, chronic HI and acute HI which occur at the PMI, the facility fenceline, the nearest residence, the nearest sensitive receptor and the maximally exposed sensitive receptor.

SFERP COOLING TOWERS ONLY

Emissions from the combustion turbine generators and the cooling towers at SFERP were modeled separately.

Dispersion modeling using a coarse grid and then a fine grid was conducted for emissions from SFERP cooling towers using the HARP program. First a coarse grid of -500 m east to 1500 m east with 200 m resolution and -1000 m north to 1000 m north with 200 m resolution was run, centered on SFERP (268 receptors). Then, to better define the risks near the SFERP, a fine grid was run of -500 m east to 1500 m east, 20 m resolution and -1000 m north to 1000 m north with 20 m resolution, centered on the proposed location of SFERP (10,348 receptors).

Results of this analysis are presented in Table 5 and in Figures 10, 11 and 12 for fine grid modeling. Results of the fine grid dispersion modeling indicate that the PMI under this scenario is located close to the eastern boundary of the facility. Table 5 lists the total maximum cancer risk, chronic HI and acute HI which occur at the PMI, the facility fenceline, the nearest residence, the nearest sensitive receptor and the maximally exposed sensitive receptor.

20 FACILITIES IN SOUTHEASTERN SAN FRANCISCO

Dispersion modeling using a coarse grid and then a fine grid was conducted for the 20 facilities modeled in the southeastern section of San Francisco using the HARP program. Emissions from SFERP were included in this analysis. First a coarse grid of 5000 m with 200 m resolution was run, centered on SFERP (2,748 receptors). Then, to better define the risks in the vicinity, a fine grid was run of 2000 m, 50 m resolution centered on SFERP (6,708 receptors).

A cumulative risk analysis was conducted for each modeling run based on emissions from the 20 facilities (50 sources total). The cancer PMI is located near One Hour Martinizing and the Southeast Water Pollution Control Plant. The results of the risk assessment based on coarse grid and fine grid modeling are presented in Table 6. Risks and hazards at the PMI and the maximally impacted sensitive receptor for the cumulative analysis are presented. Also listed are risks and hazards at the residence and sensitive receptor located nearest SFERP.

Results are also presented in Figures 13, 14 and 15 for coarse grid modeling and Figures 16, 18 and 19 for fine grid modeling. Figure 17 presents a close-up of the residential neighborhood to the east of the SE WPCP in which risks exceed 1 in a million. The maximum cancer risk estimated in this neighborhood is 19 in one million and occurs in the neighborhood near One-Hour Martinizing.

DISCUSSION

In this analysis, cancer risk and noncancer hazard due to emissions from the proposed SFERP facility are estimated due to emissions from all 5 on-site sources (3 combustion turbines and 2 cooling towers). Using fine grid dispersion modeling, the estimated cancer risk due to facility emissions is 0.073 in one million at the point of maximum impact (PMI) which is located east of the facility boundary. At the facility fenceline (assumed to be the location of the nearest workplace), cancer risk under the worker exposure scenario is 0.021 in one million. At the nearest residence located approximately 1,600 feet west of the facility, cancer risk is estimated to be 0.0014 in one million and at the nearest sensitive receptor located at Warm Water Cove Public Access (approximately 550 feet north of the facility), cancer risk is estimated to be 0.0027 in one million. Cancer risk at the maximally exposed sensitive receptor is 0.015 in one million. All cancer risks due to emissions from SFERP are less than 1 in one million. All chronic and acute noncancer hazard indices are less than 1.0 indicating a lack of noncancer hazard from facility emissions at all receptors evaluated.

Further analysis of SFERP emissions was conducted in which cancer risk and noncancer hazard were determined separately for the combustion turbines and the cooling towers. Results indicated that the majority of cancer risk estimated for the facility (0.073 in one million at the PMI located just outside the eastern facility boundary) is due to cooling tower emissions (0.074 in one million at the PMI; slight difference due to grid resolution of 25 m for all sources and 20 m for cooling towers only).

A cumulative analysis was conducted for 20 facilities located in the southeastern area of San Francisco, including SFERP, for a total of 50 emitting sources. Using fine grid modeling, the PMI for this analysis was identified in the neighborhood near One-Hour Martinizing, with a cancer risk of 19 in one million. Thus, estimates of cancer risk due to emissions from the proposed SFERP project, 0.073 in one million, are much less than the cancer risk calculated due to the cumulative emissions of facilities in the southeastern section of San Francisco. In the cumulative analysis, all off-site chronic noncancer hazard indices are less than 1.0 indicating a lack of chronic noncancer hazard from cumulative facility emissions at all receptors evaluated. Acute noncancer hazard indices are less than 1.0 in all areas evaluated with the exception of the area just to the northeast of SE WPCP.

Based on the results presented in Tables 3 and 6, risk due to SFERP emissions contributes only 0.4% to the total risk estimated for the residence located nearest SFERP (0.0014 in one million for SFERP emissions compared to 0.37 in one million calculated for emissions from 20 facilities including SFERP). For the sensitive receptor located nearest SFERP, at Warm Water Cove Public Access Park, the contribution of risk due to SFERP emissions represents 1.2% to the total risk.

In conclusion, this analysis shows that estimated SFERP emissions do not represent a significant increase to existing cancer risk and noncancer hazards in the neighborhoods evaluated.

Table 3. Cancer Risk and Noncancer Hazard due to Emissions from SFERP.

Receptor	Cancer Risk	Chronic HI	Acute HI
PMI (coarse grid)	0.038 in one million	0.0027	0.036
PMI (fine grid)	0.073 in one million	0.0027	0.038
Facility fenceline*	0.021 in one million	0.00018	0.000077
Nearest residence	0.0014 in one million	0.000029	0.0027
Nearest sensitive receptor	0.0027 in one million	0.000020	0.00032
Maximally exposed sensitive receptor	0.015 in one million**	0.0011**	0.032***

*Cancer risk and chronic HI calculated under worker exposure scenario.

**Gloria B. Davis Middle School.

***San Francisco Head Start.

Table 4. Cancer Risk and Noncancer Hazard due to Emissions from SFERP Combustion Turbines.

Receptor	Cancer Risk	Chronic HI	Acute HI
PMI	0.036 in one million	0.0027	0.038
Facility fenceline*	0.000020 in one million	0.000010	0.00016
Nearest residence	0.00036 in one million	0.000027	0.0027
Nearest sensitive receptor	0.00022 in one million	0.000016	0.00032
Maximally exposed sensitive receptor	0.015 in one million**	0.0011**	0.032***

*Cancer risk and chronic HI calculated under worker exposure scenario.

**Gloria B. Davis Middle School.

***San Francisco Head Start.

Table 5. Cancer Risk and Noncancer Hazard due to Emissions from SFERP Cooling To

Receptor	Cancer Risk	Chronic HI	Acute HI
PMI	0.074 in one million	0.00022	0.000092
Facility fenceline*	0.021 in one million	0.00017	0.000077
Nearest residence	0.0010 in one million	0.0000029	0.0000071
Nearest sensitive receptor	0.0025 in one million	0.0000073	0.000013
Maximally exposed sensitive receptor	0.0025 in one million**	0. 0000073**	0.000013**

*Cancer risk and chronic HI calculated under worker exposure scenario.

**Warm Water Cove.

Table 6. Cancer Risk and Noncancer Hazard due to Emissions from 20 Facilities.

Coarse Grid Modeling

Overall Cancer Risk PMI (located near Bell Cleaners):	8.3 in one million
Overall Chronic HI PMI (located near SE WPCP)	0.17
Overall Acute HI PMI (located near SE WPCP)	2.2

Fine Grid Modeling

Overall Cancer Risk PMI (located near One Hour Martinizing)	19 in one million
Overall Chronic HI PMI (located near SE WPCP)	0.5
Overall Acute HI PMI (located near SE WPCP)	3.9

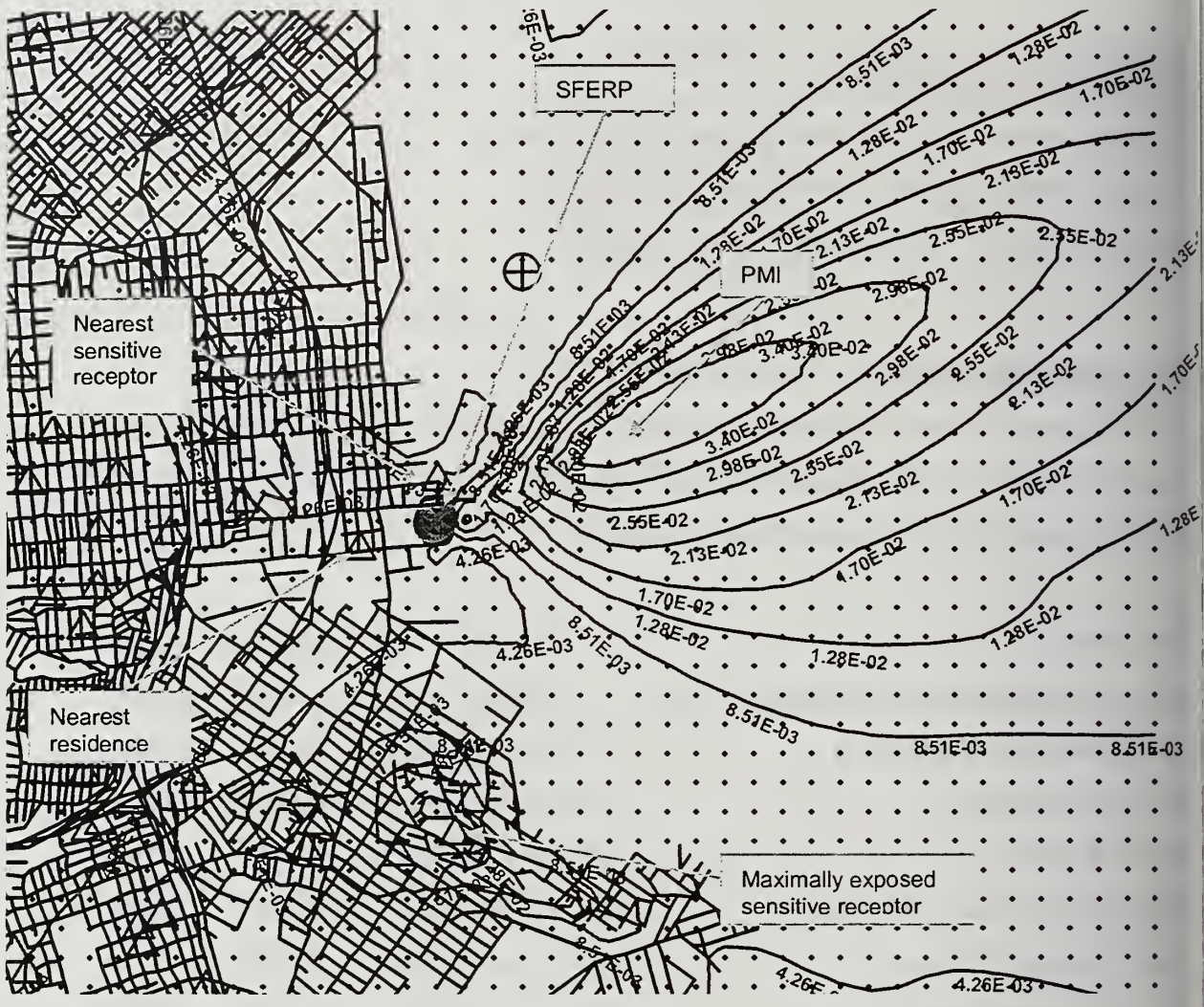
Receptor *(fine grid modeling results continued)*	Cancer Risk	Chronic HI	Acute HI
Near One-Hour Martinizing	19 in one million	0.063	0.65
Near Chevron 0683	12 in one million	0.0053	0.11
Near SE WPCP	11 in one million	0.60	3.0
Near San Francisco Petroleum	11 in one million	0.027	0.081
Near Vermont Cleaners	9.5 in one million	0.034	0.13
Near 3rd Street Shell	9.0 in one million	0.0052	0.096
Near Bell Cleaners	8.3 in one million	0.029	0.22
Near VIP Litho	2.5 in one million	0.0091	0.12
Near DeSoto Cab Co.	2.1 in one million	0.0091	0.40
Residence nearest SFERP	0.37 in one million	0.010	0.23
Sensitive receptor nearest SFERP	0.22 in one million*	0.0047*	0.093*
Maximally impacted sensitive receptor	2.1 in one million**	0.014***	0.24***

*Warm Water Cove

**International Studies Academy (near Vermont Cleaners)

***SF Southeast Headstart

Figure 1. Sources at SFERP only (coarse grid): Cancer Risk Assessment.



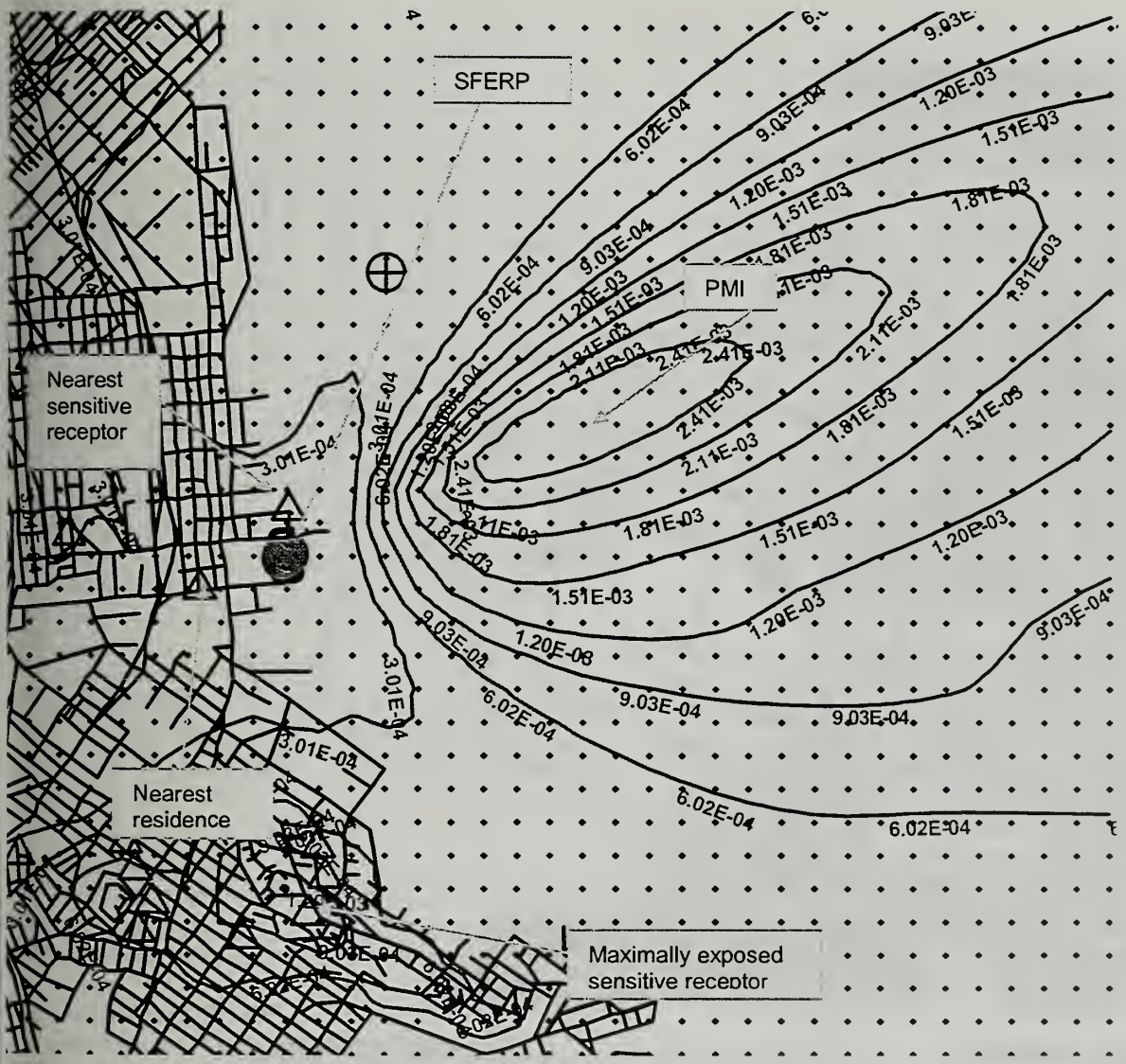
Isopleths are in 1E-06.

Receptor Location	Cancer Risk
PMI (Point of maximum impact)	3.8E-08
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	2.1E-08
Nearest residence to SFERP	1.4E-09
Nearest sensitive receptor (Warm Water Cove)	2.7E-09
Maximally exposed sensitive receptor*	1.5E-08

*Gloria B. Davis Middle School

KEY: Blue crosses are grid receptors
Blue triangles are sensitive receptors
Pink circles with X's in them are sources
Green circle with a cross in it is location of fishing receptor

Figure 2. Sources at SFERP only (coarse grid): Noncancer Chronic Hazard Index Assessment.

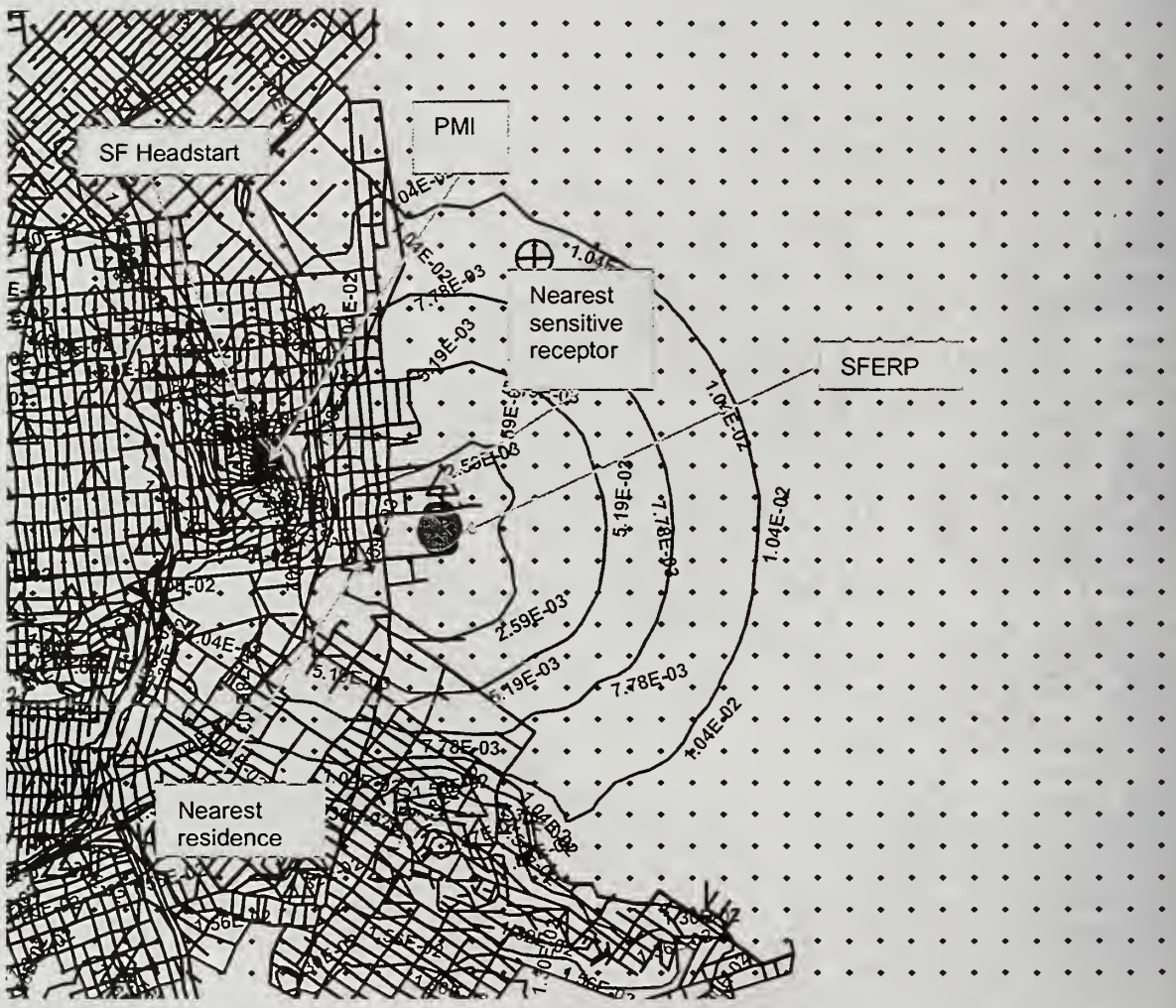


Receptor Location	Chronic Hazard Index
PMI (Point of maximum impact)	0.0027
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	0.00018
Nearest residence to SFERP	0.000029
Nearest sensitive receptor (Warm Water Cove)	0.000020
Maximally exposed sensitive receptor*	0.0011

*Gloria B. Davis Middle School

KEY: Blue crosses are grid receptors
Blue triangles are sensitive receptors
Pink circles with X's in them are sources
Green circle with a cross in it is location of fishing receptor

Figure 3. Sources at SFERP only (coarse grid): Noncancer Acute Hazard Index Assessment.

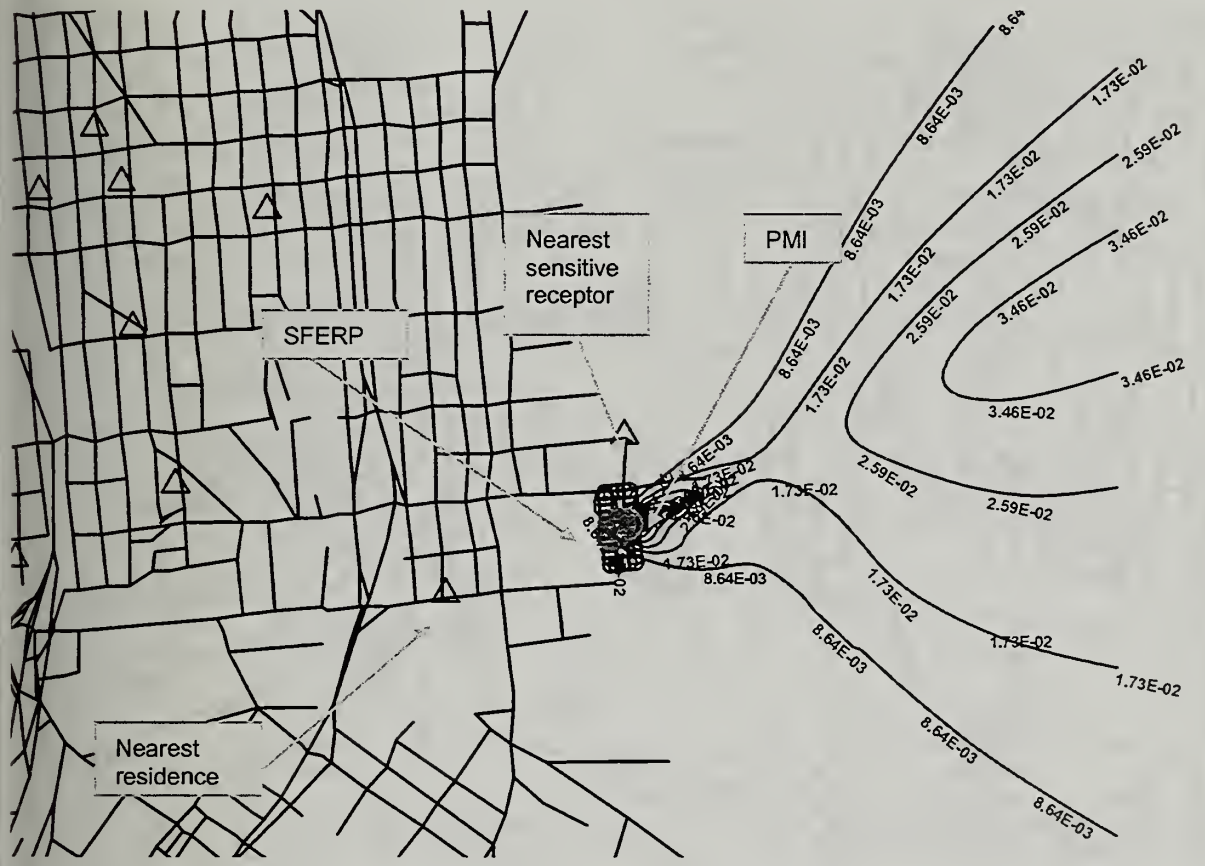


Receptor Location	Acute Hazard Index
PMI (Point of maximum impact)	0.036
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	0.000077
Nearest residence to SFERP	0.0027
Nearest sensitive receptor (Warm Water Cove)	0.00032
Maximally exposed sensitive receptor*	0.032

*San Francisco Headstart

KEY: Blue crosses are grid receptors
Blue triangles are sensitive receptors
Pink circles with X's in them are sources
Pink squares are census tracts
Green circle with a cross in it is location of fishing receptor

Figure 4. Sources at SFERP only (fine grid): Cancer Risk Assessment.



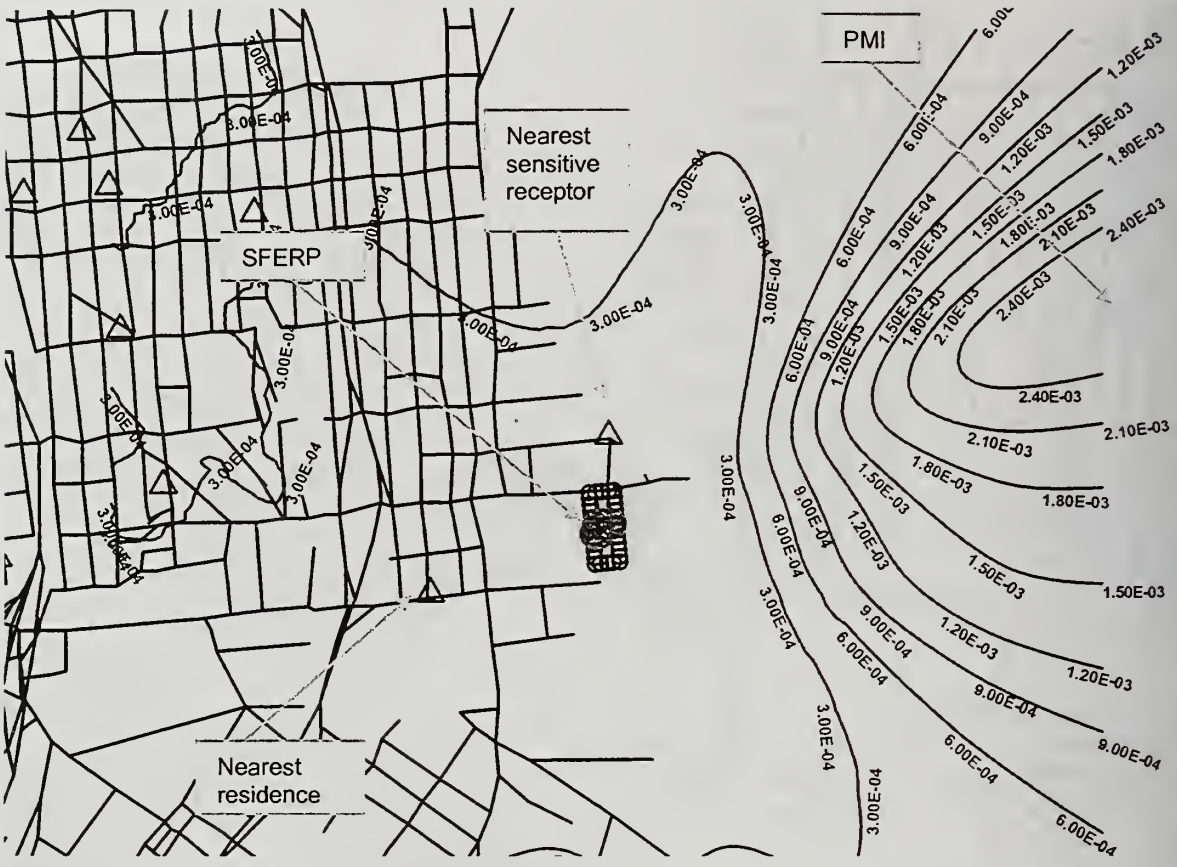
Isopleths are in 1E-06.

Receptor Location	Cancer Risk
PMI (Point of maximum impact)	7.3E-08
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	2.1E-08
Nearest residence to SFERP	1.4E-09
Nearest sensitive receptor (Warm Water Cove)	2.7E-09
Maximally exposed sensitive receptor*	1.5E-08

*Gloria B. Davis Middle School

KEY: Blue triangles are sensitive receptors
Pink circles with X's in them are sources

Figure 5. Sources at SFERP only (fine grid): Noncancer Chronic Hazard Index Assessment

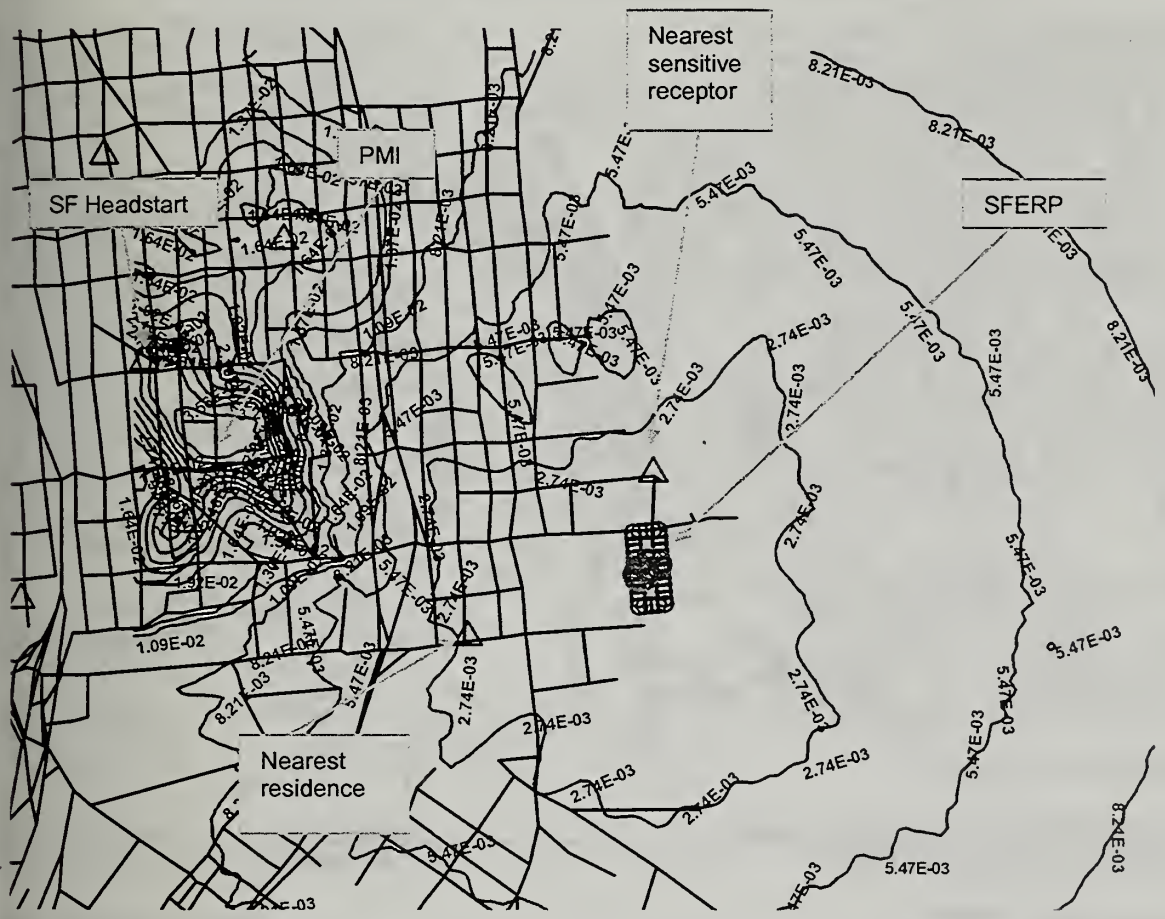


Receptor Location	Chronic Hazard Index
PMI (Point of maximum impact)	0.0027
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	0.00018
Nearest residence to SFERP	0.000029
Nearest sensitive receptor (Warm Water Cove)	0.000020
Maximally exposed sensitive receptor*	0.0011

*Gloria B. Davis Middle School

KEY: Blue triangles are sensitive receptors
Pink circles with X's in them are sources

Figure 6. Sources at SFERP only (fine grid): Noncancer Acute Hazard Index Assessment

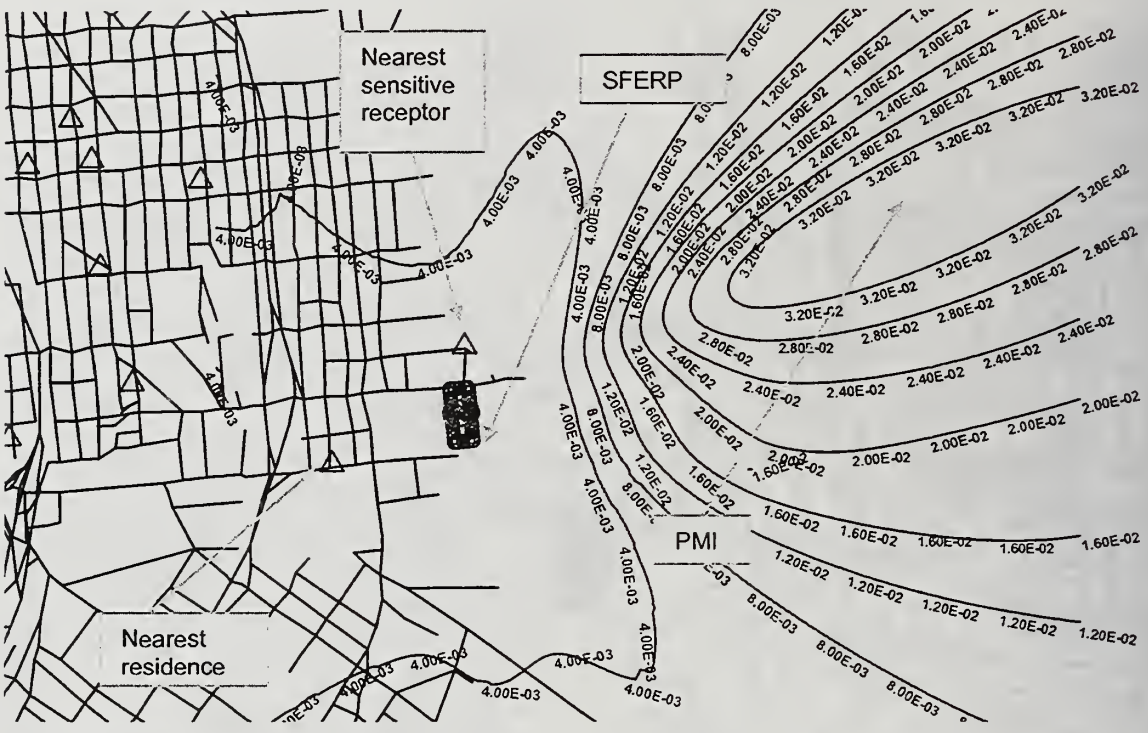


Receptor Location	Acute Hazard Index
PMI (Point of maximum impact)	0.038
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	0.000077
Nearest residence to SFERP	0.0027
Nearest sensitive receptor (Warm Water Cove)	0.00032
Maximally exposed sensitive receptor*	0.032

*San Francisco Headstart

KEY: Blue triangles are sensitive receptors
Pink circles with X's in them are sources

Figure 7. Combustion Turbine Emissions at SFERP only (fine grid): Cancer Risk Assessment



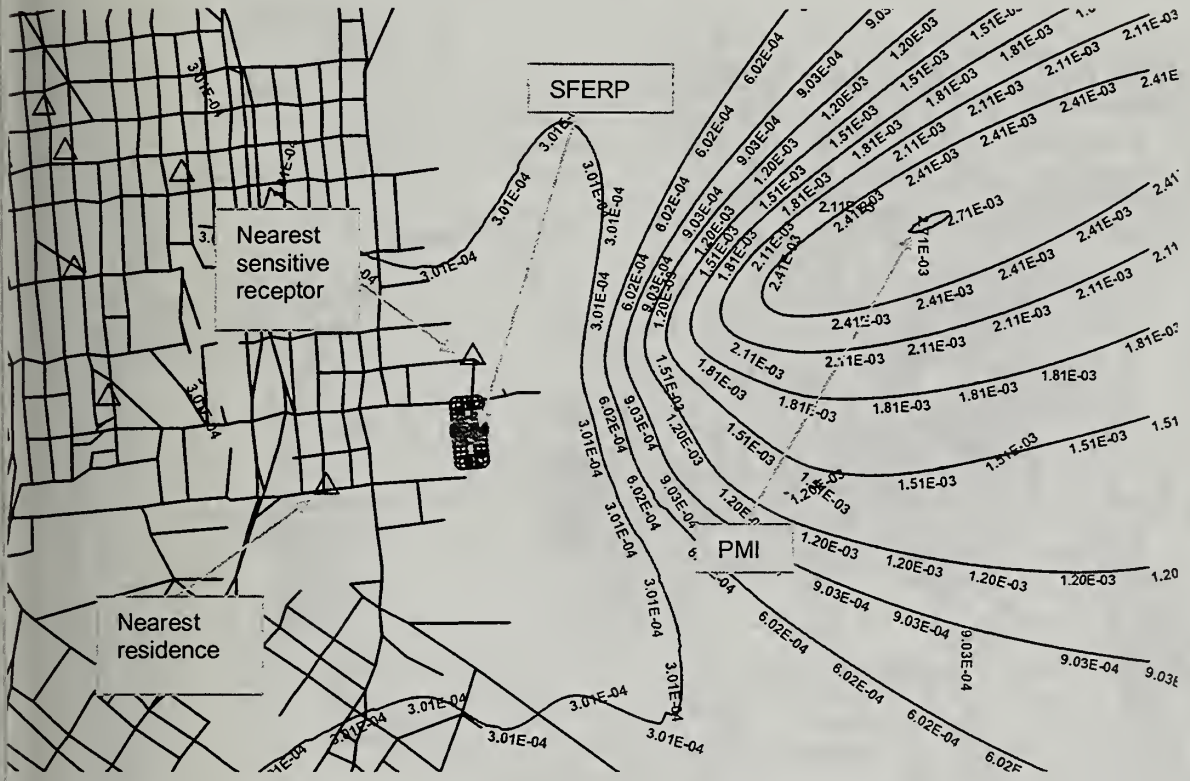
Isopleths are in 1E-06.

Receptor Location	Cancer Risk
PMI (Point of maximum impact)	3.6E-08
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	2.0E-11
Nearest residence to SFERP	3.6E-10
Nearest sensitive receptor (Warm Water Cove)	2.2E-10
Maximally exposed sensitive receptor*	1.5E-08

*Gloria B. Davis Middle School

KEY: Blue triangles are sensitive receptors
Pink circles with X's in them are sources

Figure 8. Combustion Turbine Emissions at SFERP only (fine grid): Noncancer Chronic Hazard Assessment



Receptor Location	Chronic Hazard Index
PMI (Point of maximum impact)	0.0027
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	0.000010
Nearest residence to SFERP	0.000027
Nearest sensitive receptor (Warm Water Cove)	0.000016
Maximally exposed sensitive receptor*	0.0011

*Gloria B. Davis Middle School

KEY: Blue triangles are sensitive receptors
Pink circles with X's in them are sources

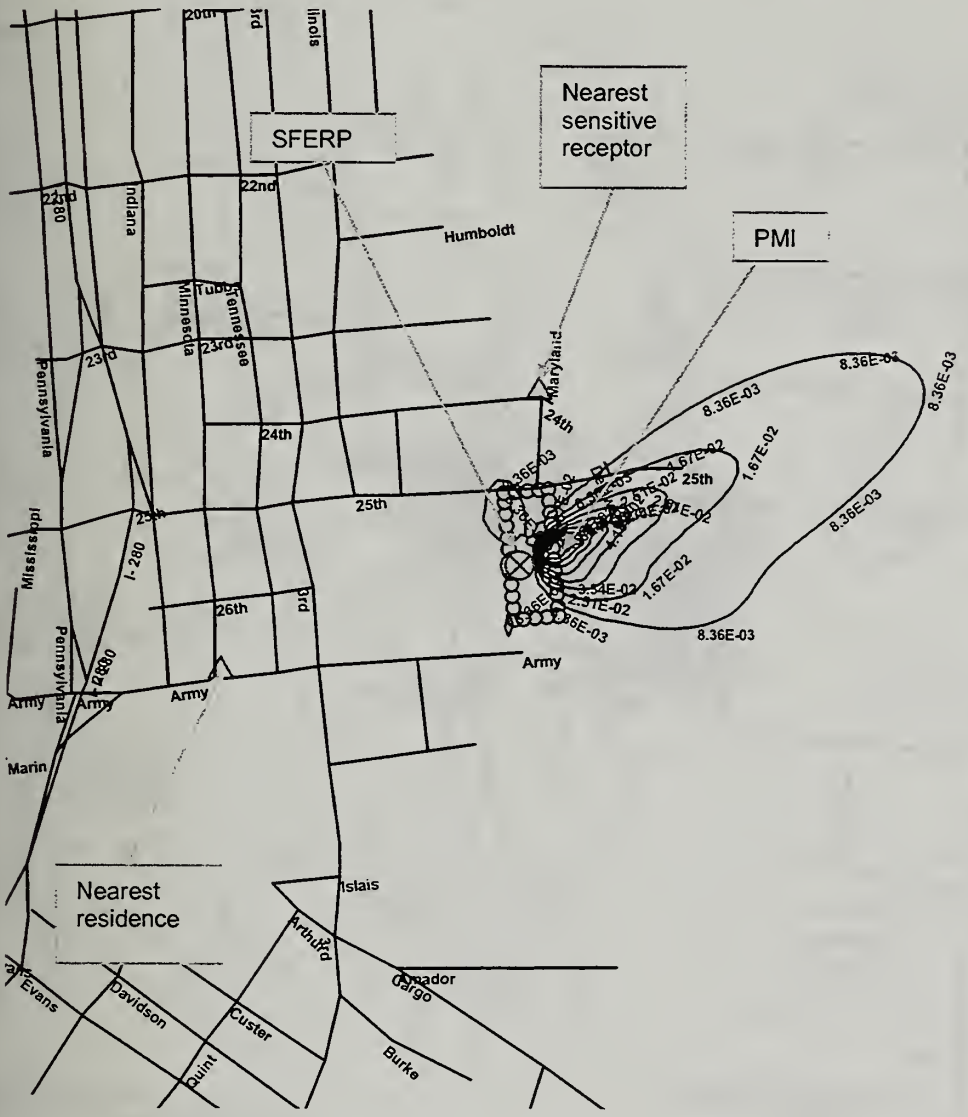
Figure 9. Combustion Turbine Emissions at SFERP only (fine grid): Noncancer Acute Hazard Assessment

Receptor Location	Acute Hazard Index
PMI (Point of maximum impact)	0.038
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	0.00016
Nearest residence to SFERP	0.0027
Nearest sensitive receptor (Warm Water Cove)	0.00032
Maximally exposed sensitive receptor*	0.032

*San Francisco Headstart

KEY: Blue triangles are sensitive receptors
Pink circles with X's in them are sources

Figure 10. Cooling Tower Emissions at SFERP only (fine grid): Cancer Risk Assessment.



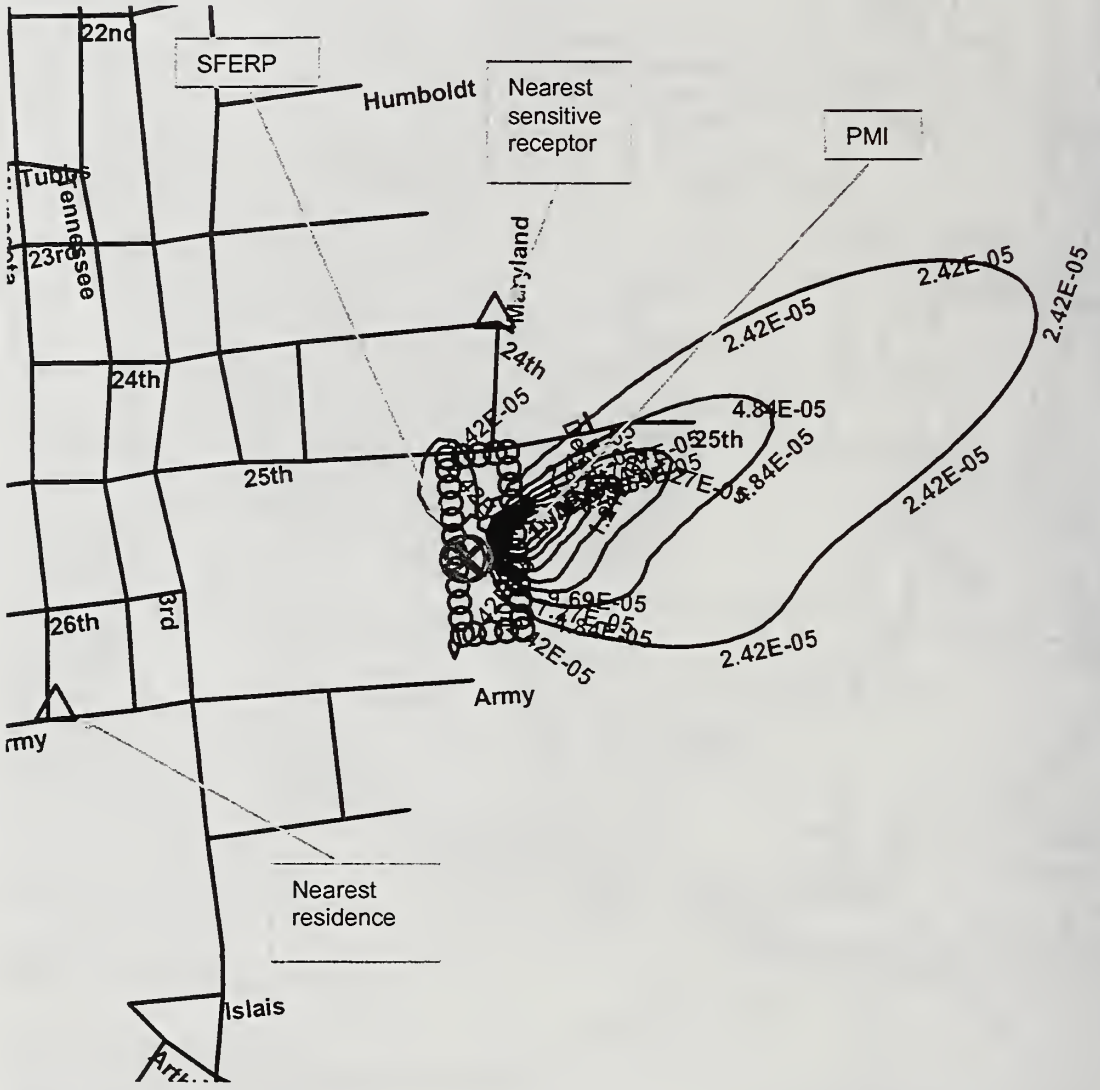
Isopleths are in 1E-06.

Receptor Location	Cancer Risk
PMI (Point of maximum impact)	7.4E-08
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	2.1E-08
Nearest residence to SFERP	1.0E-09
Nearest sensitive receptor (Warm Water Cove)	2.5E-09
Maximally exposed sensitive receptor*	2.5E-09

*Warm Water Cove

KEY: Blue triangles are sensitive receptors
Pink circles with X's in them are sources

Figure 11. Cooling Tower Emissions at SFERP only (fine grid): Noncancer Chronic Hazard Assessment.

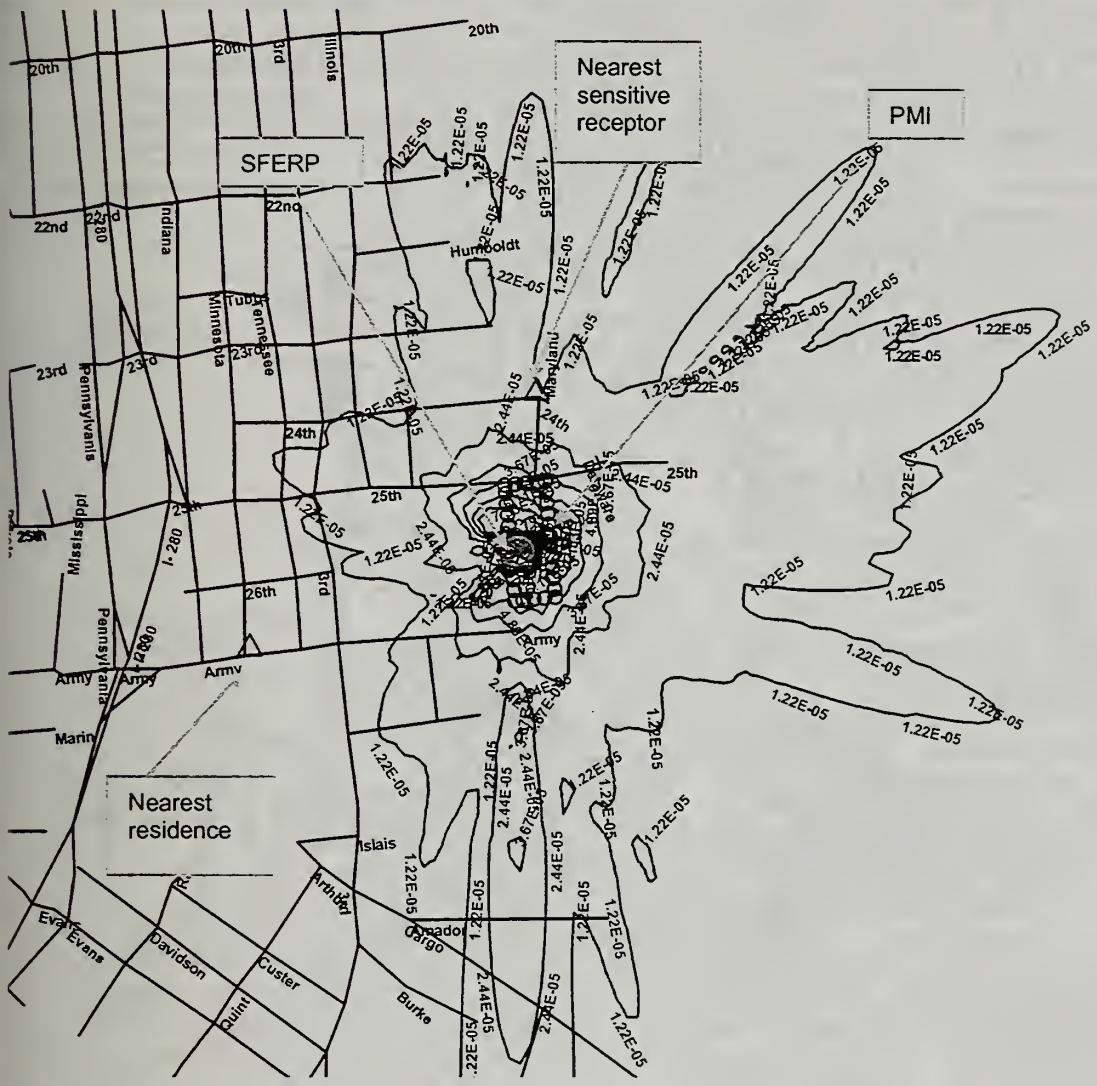


Receptor Location	Chronic Hazard Index
PMI (Point of maximum impact)	0.00022
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	0.00017
Nearest residence to SFERP	0.0000029
Nearest sensitive receptor (Warm Water Cove)	0.0000073
Maximally exposed sensitive receptor*	0.0000073

*Warm Water Cove

KEY: Blue triangles are sensitive receptors
Pink circles with X's in them are sources

Figure 12. Cooling Tower Emissions at SFERP only (fine grid): Noncancer Acute Hazard Assessment.

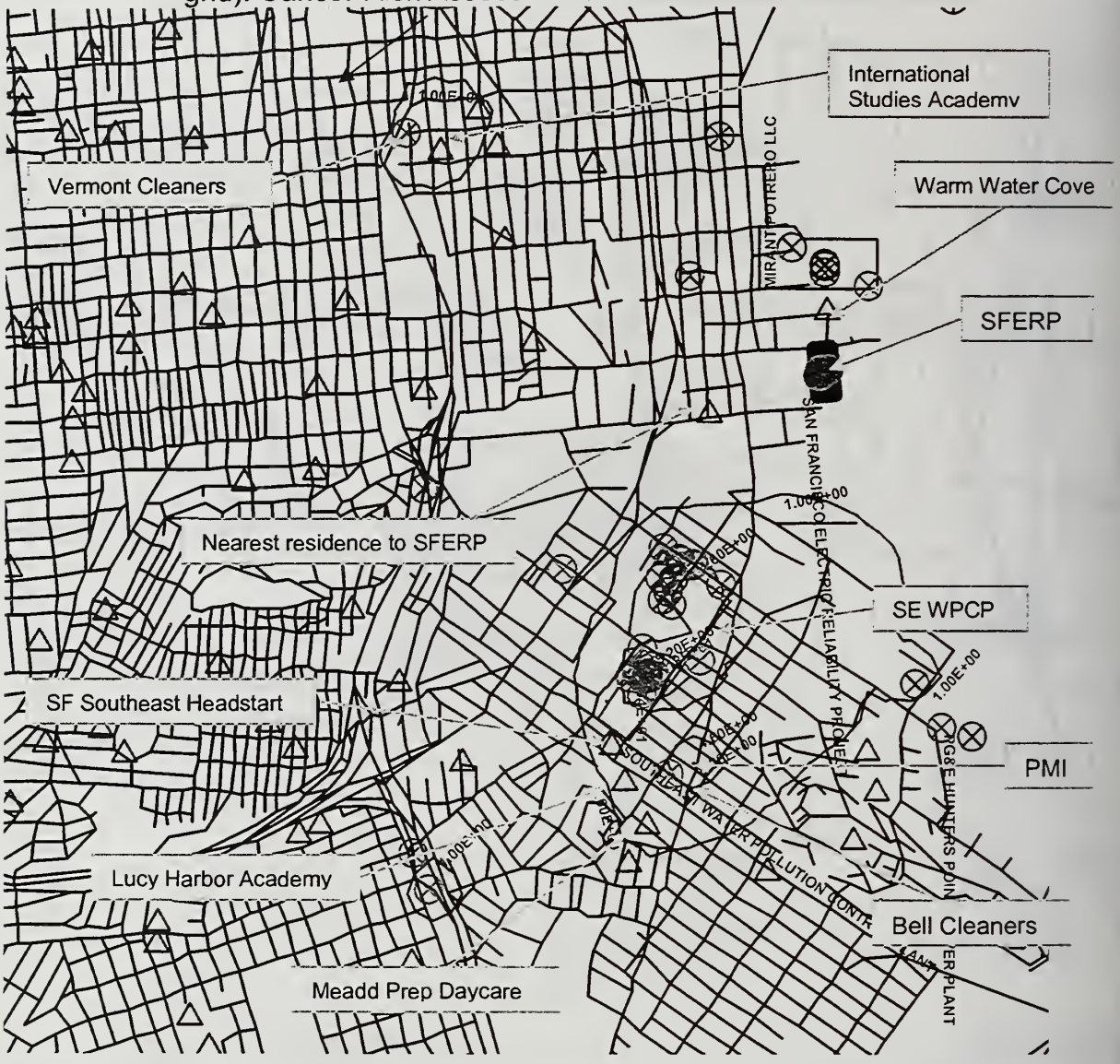


Receptor Location	Acute Hazard Index
PMI (Point of maximum impact)	0.000092
Receptors Near SFERP	
Fenceline receptor (worker exposure scenario)	0.000077
Nearest residence to SFERP	0.0000071
Nearest sensitive receptor (Warm Water Cove)	0.000013
Maximally exposed sensitive receptor*	0.000013

*Warm Water Cove

KEY: Blue triangles are sensitive receptors
Pink circles with X's in them are sources

Figure 13. Emissions from 50 Sources in Southeast San Francisco (coarse grid): Cancer Risk Assessment



Isopleths are in 1E-06.

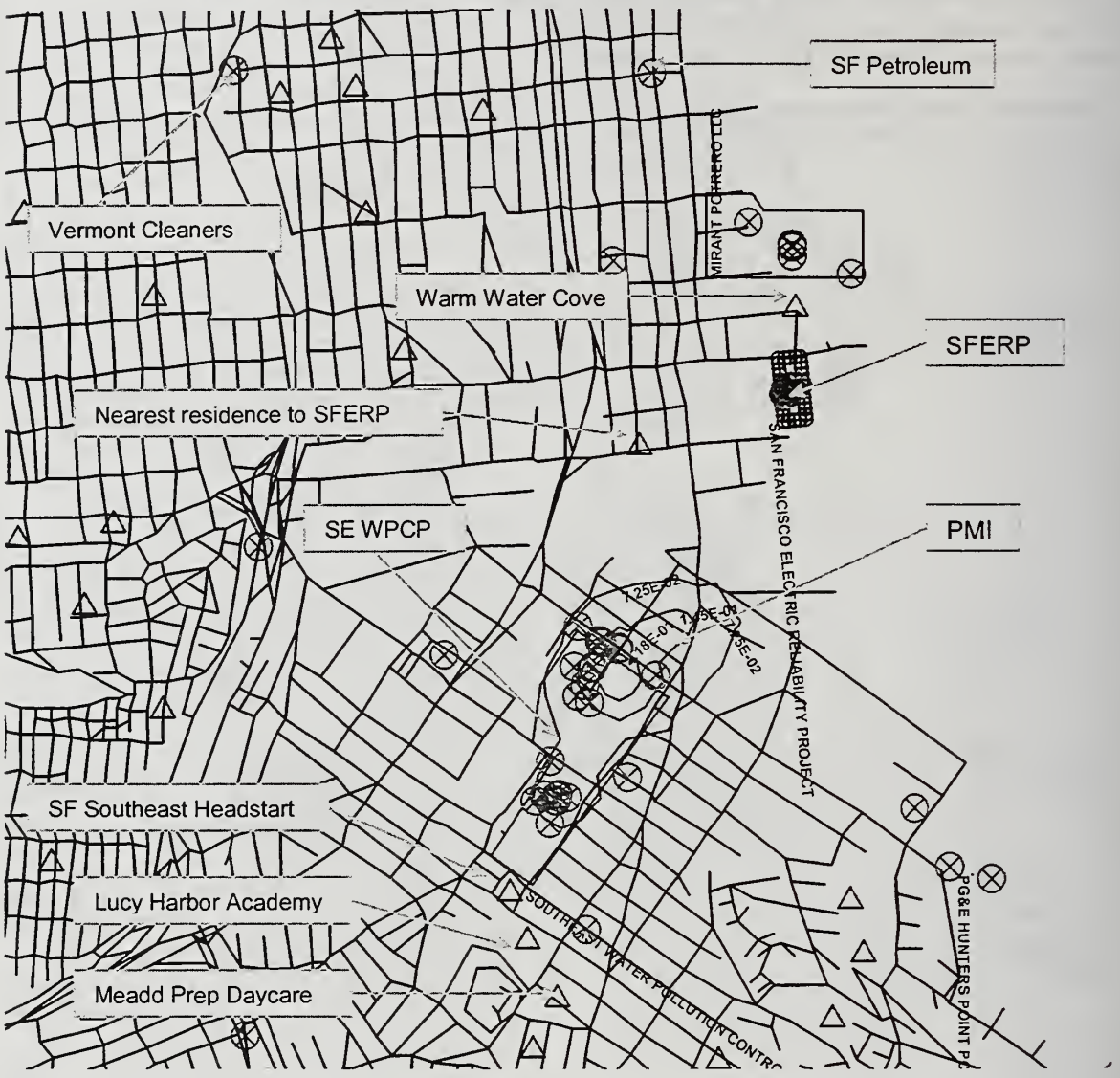
Receptor Location	Cancer Risk
PMI (Point of maximum impact)	
Near Bell Cleaners	8.3E-06
Near SE WPCP	7.6E-06
Near Vermont Cleaners	3.7E-06
Receptors Near SFERP	
Nearest residence to SFERP	3.7E-07
Nearest sensitive receptor (Warm Water Cove)	2.2E-07

Maximally Exposed Sensitive Receptors

International Studies Academy (near Vermont Cleaners)	2.1E-06
Meadd Preparatory Daycare (near SE WPCP & Bell Cleaners)	1.5E-06
SF Southeast Headstart (near SE WPCP& Bell Cleaners)	1.3E-06
Lucy Harbor Academy (near SE WPCP& Bell Cleaners)	1.2E-06

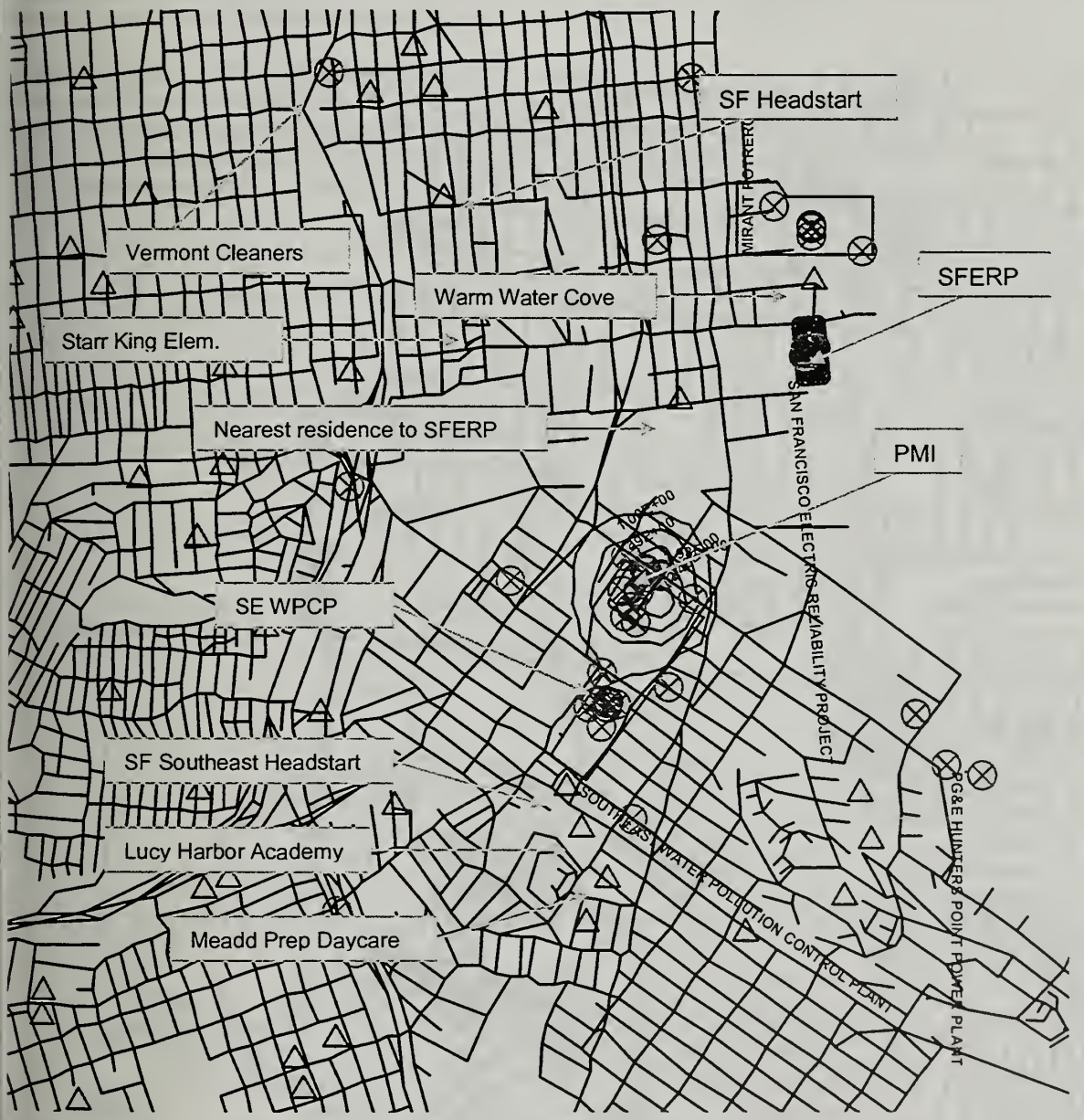
KEY: Blue triangles are sensitive receptors
Pink circles with X's in them are sources

Figure 14. Emissions from 50 Sources in Southeast San Francisco (coarse grid): Noncancer Chronic Hazard Assessment



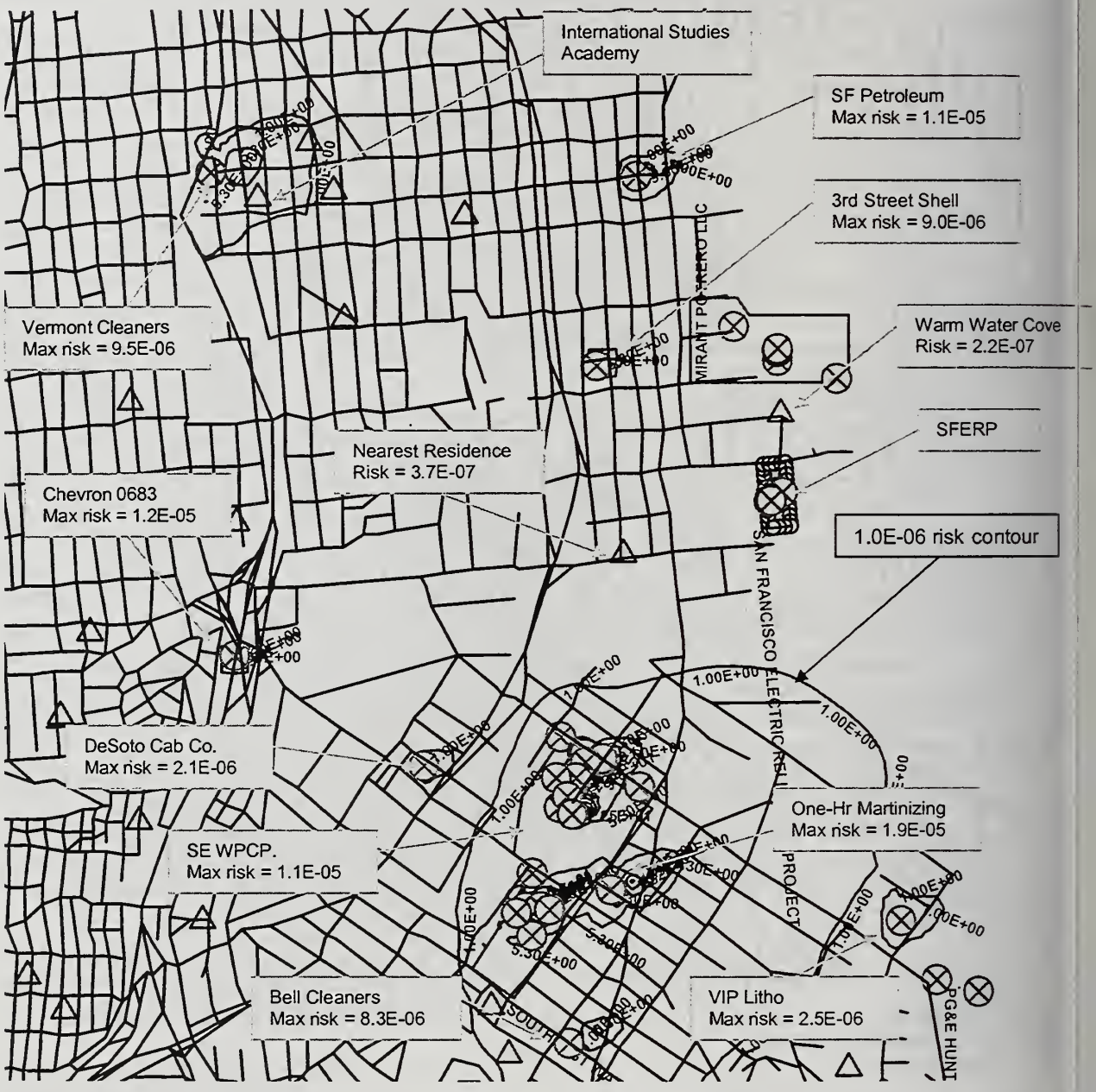
Receptor Location	Chronic Hazard Index
PMI (Point of maximum impact)	
Near SE WPCP	0.17
Receptors Near SFERP	
Nearest residence to SFERP	0.010
Nearest sensitive receptor (Warm Water Cove)	0.0047
Sensitive Receptors	
SF Southeast Headstart	0.014
Lucy Harbor Academy	0.011
Meadd Preparatory Daycare	0.0081

Figure 15. Emissions from 50 Sources in Southeast San Francisco (coarse grid): Noncancer Acute Hazard Assessment



Receptor Location	Acute Hazard Index
PMI (Point of maximum impact)	
Near SE WPCP	2.2
Receptors Near SFERP	
Nearest residence to SFERP	0.23
Nearest sensitive receptor (Warm Water Cove)	0.093
Sensitive Receptors	
SF Southeast Headstart	0.24
San Francisco Headstart & Starr King Elementary	0.20
Lucy Harbor Academy	0.13
Meadd Preparatory Day Care	0.12

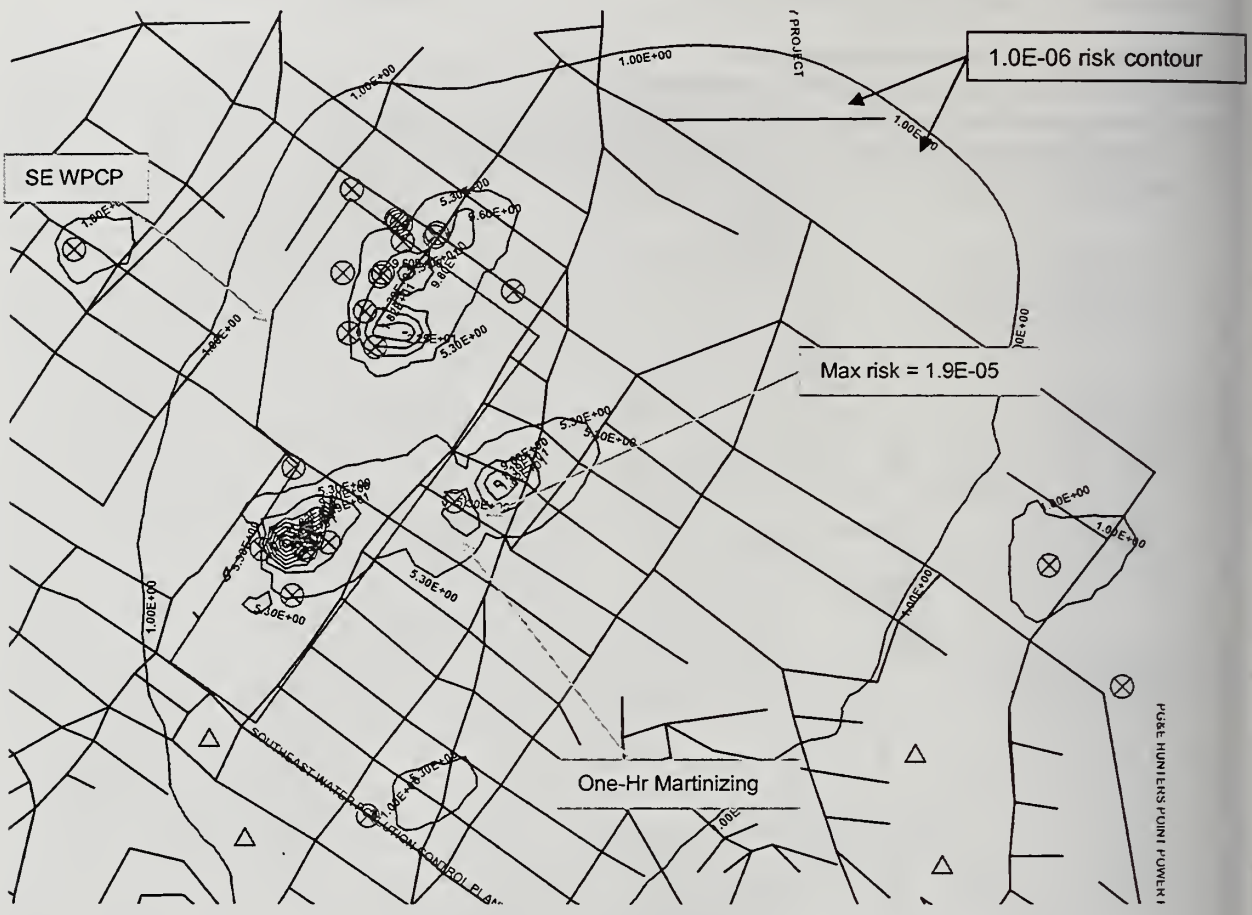
Figure 16. Emissions from 50 Sources in Southeast San Francisco (fine grid centered around SFERP): Cancer Risk Assessment



Receptor Location	Cancer Risk
PMI (Point of maximum impact)	
Near One-Hour Martinizing	1.9E-05
Near Chevron 0683	1.2E-05
Near SE WPCP	1.1E-05
Near San Francisco Petroleum	1.1E-05

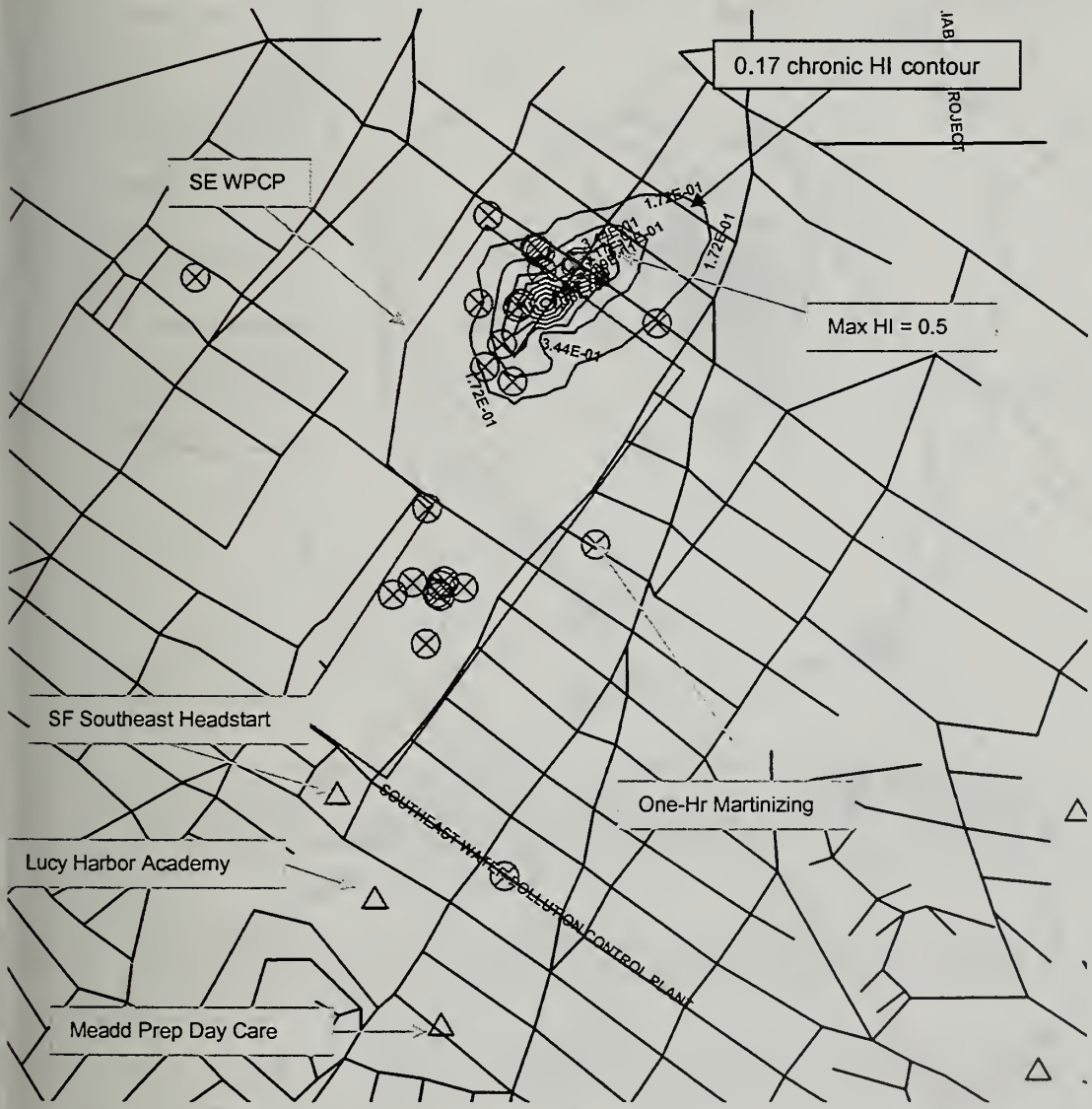
Receptor Location	Cancer Risk
Receptors Near SFERP	
Nearest residence to SFERP	3.7E-07
Nearest sensitive receptor (Warm Water Cove)	2.2E-07
Maximally Exposed Sensitive Receptors	
International Studies Academy (near Vermont Cleaners)	2.1E-06
Meadd Preparatory Day Care (near SE WPCP & Bell Cleaners)	1.5E-06
San Francisco Southeast Headstart (near SE WPCP& Bell Cleaners)	1.3E-06
Lucy Harbor Academy (near SE WPCP& Bell Cleaners)	1.2E-06

Figure 17. Emissions from 50 Sources in Southeast San Francisco (fine grid, close-up of SE WPCP vicinity): Cancer Risk Assessment.



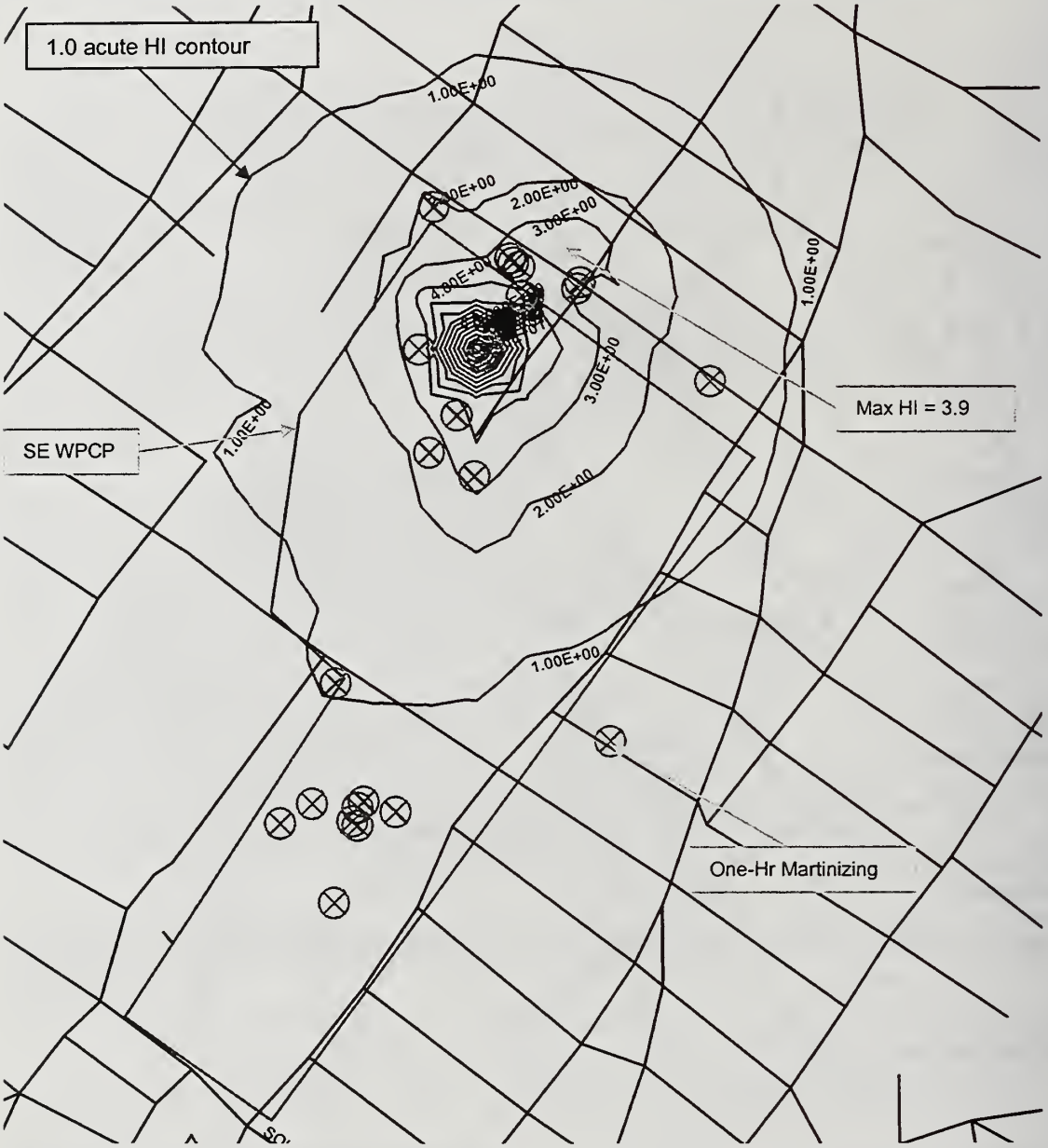
This figure illustrates that the neighborhood one block east of the SE WPCP is exposed to risks of 1E-06 and above.

Figure 18. Emissions from 50 Sources in Southeast San Francisco (fine grid, close-up of SE WPCP vicinity): Noncancer Chronic Hazard Index Assessment



Receptor Location	Chronic Hazard Index
PMI (Point of maximum impact)	
Near SE WPCP	0.5
Receptors Near SFERP	
Nearest residence to SFERP	0.010
Nearest sensitive receptor (Warm Water Cove)	0.0047
Sensitive Receptors	
SF Southeast Headstart	0.014
Lucy Harbor Academy	0.011
Meadd Preparatory Daycare	0.0081

Figure 19. Emissions from 50 Sources in Southeast San Francisco (fine grid, close-up of SE WPCP vicinity): Acute Hazard Index Assessment



Receptor Location	Acute Hazard Index
PMI (Point of maximum impact)	
Near SE WPCP	3.9
Receptors Near SFERP	
Nearest residence to SFERP	0.23
Nearest sensitive receptor (Warm Water Cove)	0.093
Sensitive Receptors	
SF Southeast Headstart	0.24
San Francisco Headstart & Starr King Elementary	0.20

Release Height ft	Stack Diameter ft	Exit Temp F	Rate acfm	Velocity fpm
41.9	13.0	70	214958	1619
41.9	13.0	70	214958	1619
85.0	12.0	744	619920	3606
85.0	12.0	744	619920	3606
85.0	12.0	744	619920	3606
4	Dimensions: 1.8 ft x 1.8 ft			
4	Dimensions: 0.3 ft x 0.3 ft			
24	1	68	78.5	100
4	1.94	75.2	2176	736
4	1.94	75.2	2316	783.5
4	1.94	75.2	1885	637.7
4	1.94	75.2	1885	637.7
4	1.94	75.2	2444	826.8
4	1.94	75.2	2444	826.8
4	2.26	75.2	6788	1692
4	2.26	75.2	3589	894.7
4	2.26	75.2	3589	894.7
4	2.26	75.2	7462	1860
4	0.5	75.2	166	845.4
4	0.5	75.2	166	845.4
4	0.82	75.2	64	121.2
21.98	3.94	1340.6	36000	2952.8
21.98	3.94	1340.6	36000	2952.8
29.2	1.84	302	3560	1338.8
29.2	1.84	302	3560	1338.8
20.01	Dimensions: 60 ft x 60 ft			
20.01	Dimensions: 60 ft x 60 ft			
4	Dimensions: 19.2 ft x 19.2 ft			
4	Dimensions: 128 ft x 128 ft			

Release Height m	Stack Diameter m	Exit Temp K	Rate	Velocity m/sec
12.8	4.0	294.1		8.2
12.8	4.0	294.1		8.2
25.9	3.7	668.556		18.3
25.9	3.7	668.556		18.3
25.9	3.7	668.556		18.3

300	11	230	295553	3110
32	10.2	840	612846	7500
32	10.2	840	612846	7500
32	10.2	840	612846	7500
18	0.5	700	2035.9	16201
4				
145.01	15.35	840.2	1231287	6654
250	11.52	311	344784	3308
30	0.75	68	1200	2716
32	0.5	68	1000	5093
43	0.83	68	1000	1848
28	5	613	2886.7	146
5	0.5	68		30
5	0.5	68		30
5	0.5	68		30
5	0.5	68		30
5	0.5	68		30
5	0.5	68		30
5	0.5	68		30
5	0.5	68		30
5	0.5	68		30
5	0.5	68		30
5	0.5	68		30
5	0.5	68		30

Table 2: SFERP Cumulative Analysis: Facility Emissions in lbs/year

Source: Table 8.1A-5

Source: Table 8.1A-5

San Francisco Electric Reliability Project

	Sources				
Substance	Gas Turbine 1	Gas Turbine 2	Gas Turbine 3	Cooling Tower 1	Cooling Tower 2

Sources				
Gas Turbine 1	Gas Turbine 2	Gas Turbine 3	Cooling Tower 1	Cooling Tower 2

Ammonia	2.62E+04	2.62E+04	2.62E+04	04	04	8.54E+00	8.54E+00	8.54E+00	06	3.91E-08
Arsenic				3.43E-03	3.43E-03				3.91E-07	3.91E-07
Benzene	6.37E+00	6.37E+00	6.37E+00			1.60E-03	1.60E-03	1.60E-03		
1,3-Butadiene	8.33E-01	8.33E-01	8.33E-01			2.10E-04	2.10E-04	2.10E-04		
Cadmium				5.15E-04	5.15E-04				5.87E-08	5.87E-08
Chromium				2.23E-03	2.23E-03				2.54E-07	2.54E-07
Copper				2.50E-02	2.50E-02				2.85E-06	2.85E-06
Ethyl benzene	6.25E+01	6.25E+01	6.25E+01			1.56E-02	1.56E-02	1.56E-02		
Formaldehyde	7.03E+02	7.03E+02	7.03E+02			1.80E-01	1.80E-01	1.80E-01		
Hexane	4.96E+02	4.96E+02	4.96E+02			1.20E-01	1.20E-01	1.20E-01		
Lead				4.27E-03	4.27E-03				4.89E-07	4.89E-07
Mercury				3.43E-05	3.43E-05				3.91E-09	3.91E-09
Naphthalene	3.17E+00	3.17E+00	3.17E+00			7.95E-04	7.95E-04	7.95E-04		
Nickel				6.68E-03	6.68E-03				7.63E-07	7.63E-07
PAHs	3.33E-01	3.33E-01	3.33E-01	2.74E-04	2.74E-04	8.58E-05	8.58E-05	8.58E-05	3.13E-08	3.13E-08
PCBs				1.71E-04	1.71E-04				1.96E-08	1.96E-08
Propylene	1.48E+03	1.48E+03	1.48E+03			3.70E-01	3.70E-01	3.70E-01		
Propylene Oxide	5.67E+01	5.67E+01	5.67E+01			1.42E-02	1.42E-02	1.42E-02		
Toluene	2.55E+02	2.55E+02	2.55E+02			6.37E-02	6.37E-02	6.37E-02		
Xylenes	1.25E+02	1.25E+02	1.25E+02			3.13E-02	3.13E-02	3.13E-02		
Zinc				1.06E-01	1.06E-01				1.21E-05	1.21E-05

Mirant Potrero LLC

Substance	Sources				
	Boiler 3	Gas Turbine 4A & B	Gas Turbine 5A & B	Gas Turbine 6A & B	Diesel Pump
Benzene	1.19E+01	7.88E+00	7.81E+00	6.56E+00	4.96E-01
Formaldehyde	1.13E+00	4.07E+01	4.04E+01	3.38E+01	6.06E-02

PAHs					3.37E-03
Arsenic					6.39E-04
Beryllium					3.72E-04
Cadmium					1.60E-03
Chromium					3.30E-05
Lead					1.35E-03
Manganese					2.12E-03
Mercury					4.53E-04
Nickel					2.58E-02

PG&E Hunters Point

Substance	Gas Turbine A & B	Boiler
Benzene	1.53E+02	2.31E+02
Formaldehyde	7.15E+02	1.13E+04

Gonzalez Steel Drum Co.

Substance	Emissions
Arsenic	3.96E-05
Benzene	9.72E-04
Beryllium	3.96E-05
Cadmium	5.70E-04
Chromium	3.13E-04
Copper	1.11E-03
Dioxins	7.64E-07
Formaldehyde	3.06E-03
Lead	1.67E-02
Manganese	4.03E-04
Mercury	2.92E-05
Naphthalene	4.65E-05
Nickel	3.13E-04
PAHs	2.26E-06
Selenium	3.96E-05
Vinyl Chloride	8.34E-04
Zinc	1.94E-02

Benzene	1.30E+01
Ethylbenzene	3.03E+00
MTBE	5.26E+02
Toluene	4.42E+01
Xylenes	5.18E+00

Facility	Substance	Emissions
Bell Cleaners	Perc	1.35E+03
One Hour Martinizing	Perc	1.35E+03
Vermont Cleaners	Perc	1.35E+03
VIP Litho	Perc	4.30E+01
Third Street Shell	Benzene	6.64E+00
Unocal 0313	Benzene	7.99E+00
Bryant Shell	Benzene	6.43E+00
Chevron 0683	Benzene	1.21E+01
DT 76	Benzene	6.03E+00
DeSoto Cab Co.	Benzene	6.30E+00
Shell Oil Co.	Benzene	6.65E+00
Silver Arco	Benzene	2.05E+01
Simas	Benzene	7.48E+00
Southpark Shell	Benzene	9.63E+00

Southeast Water Pollution Control Plant

Substance	Source 1 Bar Rack C.U.	Source 2 Grit & Screen Loading C.U.	Source 3 Grit & Screen Trans. C.U. (1)	Source 4 Grit & Screen Trans. C.U. (2)	Source 5 Grit Tank C.U. (1)	Source 6 Grit Tank C.U. (2)	Source 7 Primary Inf. End C.U.	Source 8 Primary Eff. End C.U. (1)	Source 9 Primary Eff. End C.U. (2)
Acetaldehyde									
Acrolein									
Ammonia	3.99E-01	1.30E+00	1.25E+00	1.25E+00	1.75E+00	1.75E+00	4.90E+00	2.95E+00	2.95E+00
Benzene	4.29E+00				2.80E+00	2.80E+00	7.71E+00	8.61E+00	8.61E+00
Bromomethane					5.99E-01	5.99E-01			
Carbon disulfide	4.99E-01		4.99E-01	4.99E-01	3.65E+00	3.65E+00	6.20E+00	9.79E+00	9.79E+00
Carbon tetrachloride									
Chlorine	1.00E-01	2.00E-01	1.50E-01	1.50E-01	1.50E-01	1.50E-01	3.99E-01	3.99E-01	3.99E-01
Chlorobenzene	5.99E-01	3.99E-01	3.99E-01	3.99E-01	7.99E-01	7.99E-01	1.60E+00	1.60E+00	1.60E+00

Chloroethane					1.00E+00	1.00E+00	1.70E+00		
Chloroform	4.10E+00	4.99E-01	1.25E+00	1.25E+00	2.06E+01	2.06E+01	3.92E+01	5.98E+01	5.98E+01
p-Dichlorobenzene								1.75E+00	1.75E+00
Ethylene dichloride					8.96E-01	8.96E-01	1.60E+00		
Formaldehyde									
Hydrogen sulfide	8.96E-01	3.99E-01	3.99E-01	3.99E-01	2.21E+02	2.21E+02	2.90E+02	2.45E+03	2.45E+03
Methyl chloroform	1.60E+00		1.05E+00	1.05E+00	5.70E+00	5.70E+00	1.07E+01	1.38E+01	1.38E+01
Methylene chloride	7.02E-01		5.49E-01	5.49E-01	9.52E+00	9.52E+00	1.60E+01	2.65E+01	2.65E+01
Perchloroethylene	8.40E+00	8.96E-01	1.94E+00	1.94E+00	4.56E+01	4.56E+01	6.49E+01	1.40E+02	1.40E+02
Styrene								5.90E+00	5.90E+00
Toluene	1.04E+01				1.61E+01	1.61E+01	2.51E+01	3.95E+01	3.95E+01
Trichloroethylene	3.00E-01		5.49E-01	5.49E-01	7.36E+00	7.36E+00	1.00E+01	1.41E+01	1.41E+01
Trichlorofluoromethane									
Vinyl chloride					3.00E-01	3.00E-01			
Xylenes	9.86E+00	3.40E+00	4.90E+00	4.90E+00	1.62E+01	1.62E+01	1.33E+01	1.92E+01	1.92E+01

Southeast Water Pollution Control Plant (Continued)

Substance	lb/hr Source 1 Bar Rack C.U.	Source 2 Grit & Screen Loading C.U.	Source 3 Grit & Screen Trans. C.U. (1)	Source 4 Grit & Screen Trans. C.U. (2)	Source 5 Grit Tank C.U. (1)	Source 6 Grit Tank C.U. (2)	Source 7 Primary Inf. End C.U.	Source 8 Primary Eff. End C.U. (1)	Source 9 Primary Eff. End C.U. (2)
Acetaldehyde									
Acrolein	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Ammonia	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Benzene	4.56E-05	1.48E-04	1.43E-04	1.43E-04	2.00E-04	2.00E-04	5.59E-04	3.36E-04	3.36E-04
Bromomethane	4.90E-04	0.00E+00	0.00E+00	0.00E+00	3.20E-04	3.20E-04	8.80E-04	9.83E-04	9.83E-04
Carbon disulfide	0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.84E-05	6.84E-05	0.00E+00	0.00E+00	0.00E+00
Carbon tetrachloride	5.70E-05	0.00E+00	5.70E-05	5.70E-05	4.16E-04	4.16E-04	7.07E-04	1.12E-03	1.12E-03
Chlorine	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Chlorobenzene	1.14E-05	2.28E-05	1.71E-05	1.71E-05	1.71E-05	1.71E-05	4.56E-05	4.56E-05	4.56E-05
Chloroethane	6.84E-05	4.56E-05	4.56E-05	4.56E-05	9.12E-05	9.12E-05	1.82E-04	1.82E-04	1.82E-04
Chloroform	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.14E-04	1.14E-04	1.94E-04	0.00E+00	0.00E+00
p-Dichlorobenzene	4.68E-04	5.70E-05	1.43E-04	1.43E-04	2.35E-03	2.35E-03	4.47E-03	6.83E-03	6.83E-03
Ethylene dichloride	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.00E-04	2.00E-04
Formaldehyde	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.02E-04	1.02E-04	1.82E-04	0.00E+00	0.00E+00
Hydrogen sulfide	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Methyl chloroform	1.02E-04	4.56E-05	4.56E-05	4.56E-05	2.52E-02	2.52E-02	3.31E-02	2.80E-01	2.80E-01
Methylene chloride	1.82E-04	0.00E+00	1.20E-04	1.20E-04	6.50E-04	6.50E-04	1.22E-03	1.58E-03	1.58E-03

Trichlorofluoromethane	3.43E-05	0.00E+00	6.27E-05	6.27E-05	8.41E-04	8.41E-04	1.14E-03	1.61E-03	1.61E-03
Vinyl chloride	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xylenes	0.00E+00	0.00E+00	0.00E+00	0.00E+00	3.43E-05	3.43E-05	0.00E+00	0.00E+00	0.00E+00
	1.13E-03	3.88E-04	5.59E-04	5.59E-04	1.85E-03	1.85E-03	1.51E-03	2.20E-03	2.20E-03

Southeast Water Pollution Control Plant (continued)

Substance	Source 10 Aeration Inf Chan. C.U.	Source 11 Aer. Process Vent (1)	Source 12 Aer. Process Vent (2)	Source 13 Sludge Dewater-ing	Source 14 Flare 1	Source 15 Flare 2	Source 16 Boiler 1	Source 17 Boiler 2
Acetaldehyde					4.45E+00	4.45E+00	1.65E+00	1.65E+00
Acrolein					1.85E+00	1.85E+00		
Ammonia	1.40E+00	4.99E-02	4.99E-02		2.50E-01	2.50E-01	4.49E-01	4.49E-01
Benzene	8.89E+00	1.00E-01	1.00E-01	6.00E-02	4.75E+00	4.75E+00		
Bromomethane	1.60E+00	4.99E-02	4.99E-02					
Carbon disulfide	1.57E+01	7.99E-01	7.99E-01	1.00E-01				
Carbon tetrachloride		4.99E-02	4.99E-02					
Chlorine	3.99E-01				1.20E+00	1.20E+00		
Chlorobenzene	2.50E+00			1.00E-01				
Chloroethane	3.90E+00	2.50E-01	2.50E-01					
Chloroform	9.66E+01	7.29E+00	7.29E+00	1.00E-01	1.60E+00	1.60E+00		
p-Dichlorobenzene		1.00E-01	1.00E-01	1.00E-01				
Ethylene dichloride	2.90E+00							
Formaldehyde					3.90E+00	3.90E+00	1.20E+00	1.20E+00
Hydrogen sulfide	1.15E+03	4.99E-02	4.99E-02	1.81E+01	6.18E+01	6.18E+01	9.17E+00	9.17E+00
Methyl chloroform	1.90E+01	3.49E+00	3.49E+00		4.49E-01	4.49E-01		
Methylene chloride	4.36E+01	2.45E+00	2.45E+00		7.99E-01	7.99E-01		
Perchloroethylene	1.70E+02	2.20E+01	2.20E+01					
Styrene		1.50E-01	1.50E-01					
Toluene	5.47E+01	7.02E-01	7.02E-01					
Trichloroethylene	2.33E+01	2.50E+00	2.50E+00					
Trichlorofluoromethane		2.50E-01	2.50E-01					
Vinyl chloride		4.99E-02	4.99E-02					
Xylenes	2.85E+01	1.00E-01	1.00E-01					

Substance	Source 10 Aeration Inf Chan. C.U.	Source 11 Aer. Process Vent (1)	Source 12 Aer. Process Vent (2)	Source 13 Sludge Dewater-ing	Source 14 Flare 1	Source 15 Flare 2	Source 16 Boiler 1	Source 17 Boiler 2
Acetaldehyde	0.00E+00	0.00E+00	0.00E+00	0.00E+00	5.07E-04	5.07E-04	1.88E-04	1.88E-04
Acrolein	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.11E-04	2.11E-04	0.00E+00	0.00E+00
Ammonia	1.59E-04	5.70E-06	5.70E-06	0.00E+00	2.85E-05	2.85E-05	5.13E-05	5.13E-05
Benzene	1.01E-03	1.14E-05	1.14E-05	6.85E-06	5.42E-04	5.42E-04	0.00E+00	0.00E+00
Bromomethane	1.82E-04	5.70E-06	5.70E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Carbon disulfide	1.79E-03	9.12E-05	9.12E-05	1.14E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Carbon tetrachloride	0.00E+00	5.70E-06	5.70E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Chlorine	4.56E-05	0.00E+00	0.00E+00	0.00E+00	1.37E-04	1.37E-04	0.00E+00	0.00E+00
Chlorobenzene	2.85E-04	0.00E+00	0.00E+00	1.14E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Chloroethane	4.45E-04	2.85E-05	2.85E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Chloroform	1.10E-02	8.33E-04	8.33E-04	1.14E-05	1.82E-04	1.82E-04	0.00E+00	0.00E+00
p-Dichlorobenzene	0.00E+00	1.14E-05	1.14E-05	1.14E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Ethylene dichloride	3.31E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Formaldehyde	0.00E+00	0.00E+00	0.00E+00	0.00E+00	4.45E-04	4.45E-04	1.37E-04	1.37E-04
Hydrogen sulfide	1.31E-01	5.70E-06	5.70E-06	2.06E-03	7.06E-03	7.06E-03	1.05E-03	1.05E-03
Methyl chloroform	2.16E-03	3.99E-04	3.99E-04	0.00E+00	5.13E-05	5.13E-05	0.00E+00	0.00E+00
Methylene chloride	4.97E-03	2.79E-04	2.79E-04	0.00E+00	9.12E-05	9.12E-05	0.00E+00	0.00E+00
Perchloroethylene	1.94E-02	2.51E-03	2.51E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Styrene	0.00E+00	1.71E-05	1.71E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Toluene	6.24E-03	8.01E-05	8.01E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Trichloroethylene	2.66E-03	2.85E-04	2.85E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Trichlorofluoromethane	0.00E+00	2.85E-05	2.85E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Vinyl chloride	0.00E+00	5.70E-06	5.70E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xylenes	3.26E-03	1.14E-05	1.14E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Southeast Water Pollution Control Plant (continued)

Substance	Source 18 Digestor Complex 1	Source 19 Digestor Complex 2	Source 20 DAF (Tank & Weir)	Source 21 2° Clar.	Source 22 Cogen. Engine
Acrolein					7.00E-01

Substance	Source 18 Digestor Complex 1	Source 19 Digestor Complex 2	Source 20 DAF (Tank & Weir)	Source 21 2° Clar.	Source 22 Cogen. Engine
Acrolein					7.99E-05

Ammonia			3.00E-01	3.00E+00						
Benzene	4.99E-02	4.99E-02			2.57E+02	5.70E-06	5.70E-06			2.93E-02
Bromomethane										
Carbon disulfide			3.00E-01	4.10E+00				3.43E-05	4.68E-04	
Carbon tetrachloride										
Chlorine				2.70E+00					3.08E-04	
Chlorobenzene	1.00E-01	1.00E-01				1.14E-05	1.14E-05			
Chloroethane				1.00E-01					1.14E-05	
Chloroform			2.20E+00	5.02E+01				2.51E-04	5.73E-03	
p-Dichlorobenzene	4.99E-02	4.99E-02	2.00E-01	2.31E+01	8.50E+00	5.70E-06	5.70E-06	2.28E-05	2.63E-03	9.70E-04
Ethylene dichloride										
Formaldehyde					4.11E+01					4.69E-03
Hydrogen sulfide	1.42E+02	1.42E+02	1.98E+01	4.20E+00		1.62E-02	1.62E-02	2.26E-03	4.79E-04	
Methyl chloroform			2.00E-01	3.60E+00				2.28E-05	4.11E-04	
Methylene chloride			7.02E-01	1.24E+01	3.34E+01			8.01E-05	1.41E-03	3.81E-03
Perchloroethylene			2.80E+00	5.90E+01				3.20E-04	6.73E-03	
Styrene			1.00E-01	6.29E+00	1.49E+01			1.14E-05	7.18E-04	1.70E-03
Toluene	1.50E-01	1.50E-01		1.00E-01	6.94E+01	1.71E-05	1.71E-05		1.14E-05	7.92E-03
Trichloroethylene			3.00E-01	5.29E+00				3.43E-05	6.04E-04	
Trichlorofluoromethane										
Vinyl chloride	4.99E-02	4.99E-02				5.70E-06	5.70E-06			
Xylenes	1.00E-01	1.00E-01			1.75E+01	1.14E-05	1.14E-05			2.00E-03

SOCIOECONOMICS

James Adams

SUMMARY OF CONCLUSIONS

Staff has determined that the San Francisco Electric Reliability Project would not cause a significant adverse direct or cumulative socioeconomic impact on the area's housing, schools, police, emergency services, hospitals, and utilities because most of the construction and operation workforce is within the regional or local labor market area, and construction activities are short-term. There are estimated benefits from the San Francisco Electric Reliability Project which include increases in sales taxes, employment, and income for San Francisco and neighboring counties (see **Socioeconomics Table 2** for data and information).

INTRODUCTION

This California Energy Commission socioeconomic impact analysis evaluates the project induced changes on community services and/or infrastructure and presents demographic screening data for the area within one and six miles of the proposed project site. Direct, indirect, and cumulative impacts are also addressed. The analysis identifies the estimated impact of the construction and operation of the San Francisco Electric Reliability Project (SFERP) on local communities, community resources, and public services.

LAWS, ORDINANCES, REGULATIONS AND STANDARDS

The SFERP will be owned and operated by an agency of the City and County of San Francisco (CCSF) and is exempt from paying school impact fees as required by California Government Code section 65995(d). California Government Revenue and Taxation Code 202(a) exempts city property from taxes. There are no applicable socioeconomic laws, ordinances, regulations and standards (LORS).

SETTING

The affected area for socioeconomics as defined by the SFERP in the Application for Certification (AFC) and considered by staff is the greater CCSF area and the San Francisco Metropolitan Statistical Area (MSA), which includes the counties of San Francisco, San Mateo, and Marin. In addition, San Francisco is also in close proximity to six other counties including Alameda, Contra Costa, Napa, Santa Clara, Solano, and Sonoma. This is generally referred to as the nine-county Bay Area.

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project may have a significant effect on population, housing and public services if the project will:

- induce substantial population growth in an area, either directly or indirectly;
- displace substantial numbers of people and/or existing housing, necessitating the construction of replacement housing elsewhere; or
- adversely impact acceptable levels of service for fire and police protection, schools, parks, and other public facilities.

A socioeconomic analysis is unique in that it looks at beneficial impacts on local finances from property and sales taxes as well as potential adverse impacts on public services. In order to determine if a project would have any significant impacts, staff analyzes the current status of these community services and revenue streams. This is followed by an assessment of whether the existing services and capacities can absorb the project related impacts in each of these areas. If the project's impacts could appreciably strain or degrade these services, staff considers this to be a significant adverse impact and would propose mitigation. Usually, the project's property tax payments provide sufficient funds for local governments to augment public services as needed to meet project needs. In the case of SFERP, the City of San Francisco is a public agency and does not pay property taxes or school impact fees, but the project would result in construction and operation jobs and will provide revenue from sales tax for project expenditures, and for the electricity generated.

For all siting cases, Energy Commission staff also conducts an environmental justice screening analysis in accordance with the "Final Guidance for Incorporating Environmental Justice Concerns in USEPA's National Environmental Policy Act (NEPA) Compliance Analysis" dated April 1998. The purpose of the screening analysis is to determine whether there exists a minority or low-income population within the potentially affected area of the proposed site.

California statute, section 65040.12 (c) of the Government Code, defines "environmental justice" to mean "fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." In light of the progress made by federal environmental agencies on environmental justice, the Energy Commission has examined federal guidelines pursuant to its desire to follow environmental justice principles for the environmental review of this project.

The steps recommended by these guidance documents to assure compliance with the Executive Order are: (1) outreach and involvement; (2) a screening-level analysis to determine the existence of a minority or low-income population; and (3) if warranted, a detailed examination of the distribution of impacts on segments of the population. Though the Federal Executive Order and guidance are not binding on the Energy

Commission, staff finds these recommendations helpful for implementing this environmental justice analysis. Staff has followed each of the above steps for the following 11 sections in the SFERP Preliminary Staff Assessment: Air Quality, Hazardous Materials, Land Use, Noise, Public Health, Socioeconomics, Soils and Water, Traffic and Transportation, Transmission Line Safety/Nuisance, Visual Resources, and Waste Management.

The purpose of the environmental justice screening analysis is to determine whether a low-income and/or minority population exists within the potentially affected area of the proposed site. Staff conducted the screening analysis in accordance with the "Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analysis" (Guidance Document) dated April 1998. People of color populations, as defined by this Guidance Document, are identified where either:

- the minority population of the affected area is greater than fifty percent of the affected area's general population; or
- the minority population percentage of the area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.

DIRECT/INDIRECT IMPACTS AND MITIGATION

Staff reviewed the SFERP AFC, Vol. I, Socioeconomics section (SFERP 2004a, Subsection 8.8), and subsequent filings and communications. Amendment A (SFPUC 2005a) to the original AFC has the most current information and is the primary document used for this analysis. Based on staff's use of the socioeconomic data provided and referenced from governmental agencies, trade associations and staff's independent analysis, staff provides the following socioeconomic analysis and conclusions.

Population, Employment, And Economy

The 2000 U.S. Census shows that California had a total population of 33,871,648, with minority (non-white and white-Hispanic) population of 18,054,858 (53.3 percent), and a white population of 15,816,790 or (46.7 percent). The City and County of San Francisco had a total population of 776,733, with a minority population of 437,824 (56.3 percent), and a white population of 338,909 or 43.4 percent (U.S. Census Bureau 2004). By 2010, projections show a California population of 39,246,767, and 816,200 residents in San Francisco City and County (SFPUC 2005a, Table 8.8-2, p. 8.8-3). As discussed below, the majority of construction and operation labor is likely to be local, so there would be little induced population growth from the SFERP. During construction, individual work assignments typically last from several days to weeks which suggest that there will be no permanent relocation of construction workers. Furthermore, there would be no displacement of population by the SFERP.

There were 43,600 construction workers in the San Francisco MSA in 2002. The number of construction workers increased two percent a year from 1999 to 2002 (SFPUC 2005a, Table 8.8-5, p. 8.8-4). Staff believes that most construction workers travel to the job site on a daily basis, which may involve as much as a one or two-hour commute. Construction workers who live in communities at greater distances than a two-hour, one-way commute tend to relocate to the project area for the work week, then

return home on the weekend. Operations workers tend to live within a one-hour, one-way commute, and if they live outside this area they would likely relocate. A small percentage of operation workers may live more than a one-hour drive from the SFERP site.

Socioeconomics Table 1 shows that available labor, by skill, in San Francisco MSA, with annual averages for 2001 and a projection for 2008, is large when compared to th SFERP needs. The San Francisco County MSA has a fairly large construction workforce of 42,200 as of May 2004 (State of California 2004). The peak construction activity (264 workers) for the SFERP represents less than 0.01 percent of the available workforce.

Project construction (power generation including the natural gas pipeline, processed water pipeline, and electric power transmission line) is expected to occur over a 12-month period. The greatest number of construction workers (peak) will occur in the sixt and seventh months of construction. The number of construction workers will range from 50 in the first and last few months of construction to 258 workers at peak construction. There will be an average of 161 workers per month during construction. These workers will likely come mainly from the local area.

The unemployment rate for the San Francisco MSA was 4.4 percent in May 2004, not seasonally adjusted. This is close to full employment. For California, the unemployme rate was 5.8 percent (State of California 2004). Given the large number of workers in the trades noted in **Socioeconomics Table 1,** staff accepts the applicant's estimate that the construction workforce would come from within the greater San Francisco Bay area (SFERP 2004a, p. 8.8-11) and the vast majority would commute to the job on a daily or weekly basis.

During operation of the project, about 11 workers will be needed to maintain and operate the project. Most of the operational workers are expected to come from San Francisco County, with most of the rest coming from the greater nine-county Bay Area. Staff agrees with the applicant that a small increase in employment will have little effec on employment rates.

SOCIOECONOMICS Table 1
Available Labor in San Francisco MSA by Skill for Construction and Operations

Occupational Title	Annual Averages 2001	2008	Percent Change
Masons & concrete finishers	1,170	1,130	-3.4
Carpenters	8,570	9,020	0.7
Painters, Construction & Maintenance	2,900	3,120	1.1
Sheet Metal Workers	1,230	1,390	1.8
Electricians	3,890	4,360	1.6
Welders, Cutters, Solderers, & Blazers	1,270	1,420	1.6
Industrial Truck & Tractor Drivers	1,690	1,720	0.3
Operating Engineers	1,050	1,080	0.4
Helpers, Laborers	7,770	8,190	0.8
Pipe fitters/plumbers/steam fitters	2,040	2,090	0.3
Mechanical Engineers	810	900	11.1
Electrical and Electronic Engineers (including technicians)	3,750	4,030	1.0
Plant and System Operators	1,000	1,080	1.1

Sources: SFPUC 2005a, Table 8.8-13, p. 8.8-16; CEDD 2004

The Impact Analysis for Planning (IMPLAN) model (an input-output model), used by the applicant to estimate employment impacts from the SFERP on the study area, is widely used and acceptable to staff. The University of California at Berkeley uses the IMPLAN model for regional economic assessment, and it has been used to assess other generating projects in California and the U.S. In general, most multipliers are estimated by showing the total change divided by the initial change. Employment multipliers refer to the total additional employment stimulated by the new economic activity. IMPLAN is a disaggregated type of model that divides the (regional) economy into sectors and provides a multiplier for each sector. Social Accounting Matrix (SAM)[1] multipliers were used for the applicant's economic impact analysis. SAM multipliers are similar to Type II[2] multipliers because they both include the indirect and induced effects (secondary impacts).

An IMPLAN SAM variety employment multiplier of 1.27 for the base case was used for construction (e.g., the 161, average per month, construction jobs' income supports

[1] Type SAM multipliers capture inter-institutional transfers and account for social security and income tax leakages, institutional savings, and commuting.

[2] A Type I multiplier is the ratio of the direct plus indirect change to the direct change resulting from a unit increase in final demand for any given sector. A Type II multiplier is the ratio of the direct, indirect, and induced change to the direct change resulting from a unit increase in final demand. The Type II multiplier takes into account the SFERP repercussionary effects of secondary rounds of consumer spending in addition to the direct and indirect inter-industry effects (Richardson 1972). Both multipliers can be of an income or employment type. Indirect changes are production changes in industries supplying the original industry (backward linkages). Induced changes are changes in regional household spending levels caused by regional employment impacts.

approximately 44 indirect and induced jobs in the regional economy for a projected tota of 205 jobs)[3]. An IMPLAN SAM variety employment multiplier of 1.4 was used for operations indicating that the 11 direct jobs support approximately four indirect and induced jobs in the regional economy, resulting in a projected total of 15 jobs. An IMPLAN SAM model multiplier of 1.2 was used for the construction expenditure of $11.05 million, which results in an indirect and induced income of $2.5 million, and a total projected income of $13.55 million.

Finally, an IMPLAN SAM variety operation income multiplier of 2.0 was used regarding a $1.17 million annual operating budget within San Francisco that results in an indirect and induced income of $1.17 million, and a projected total income of $2.34 million.[4] These multipliers are within an acceptable range of 2 to 2.5 over the long run often cited by many economists; therefore, staff considers these projected beneficial economic impacts to be reasonable (SFPUC 2005a, pp. 8.8-19).

Housing

According to federal standards, permanent housing is considered to be in short supply if the vacancy rate is less than five percent (URS 2000). As of January 1, 2004, there were approximately 354,490 housing units in San Francisco County with a median home price of $540,000 (CDOF 2004). The vacancy rate for this housing averages approximately 2.9 percent for San Francisco County. There are over 32,000 hotel rooms in the City of San Francisco with an average vacancy rate of 30 percent (San Francisco 2004). The housing units available to non-local construction workers for this project are sufficient for worker needs. Staff believes that a majority of the construction workforce, and most of the operations work force, would be drawn from the local labor force and would not require new lodging. Also, non-local construction workers typically stay in moderately priced hotels/motels, which in this case could be found in the East Bay or San Mateo County. Given the relatively small number of SFERP construction (i.e. 264 at peak) and permanent (i.e. 15) workers, the project is not expected to result in the displacement of housing.

Fiscal

The SFERP capital costs for construction are estimated to be $140 million (SFPUC 2005a, p. 8.8-17). This amount does not include the cost for combustion turbines that the City acquired through a settlement with Williams Energy Marketing and Trading Company. The construction payroll is $13.4 million and the estimated value of materials and supplies that will be purchased locally (within San Francisco County) during construction is between $2 and $3 million. Sales tax is paid on material and supply expenditures. The sales tax rate of 8.5 percent in San Francisco County is comprised of the state sales tax rate (six percent), one percent to the place of sale, 0.25 percent to the county, and 1.25 percent to special districts. The total sales tax estimated during construction is expected to be between $170,000 and $255,000. The SFERP, which will be administered by the CCSF, is exempt from property taxes pursuant to California

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[3] Based on $2 to $3 million in local (San Francisco) construction expenditures.

[4] All project construction and operations economic estimates are presented in 2003 dollars (CH2MHill 2004a).

Revenue and Taxation Code section 202(a). **Socioeconomics Table 2** displays the socioeconomic data and information.

SOCIOECONOMICS Table 2 Data And Information[5]	
Estimated Project Capital Costs	$140 million[6]
Estimate of Locally Purchased Materials	
Construction	$2 - $3 million
Operation	$250,000 per year
Estimated Annual Property Taxes	Not applicable. SFERP is a public agency.
Estimated School Impact Fees	SFERP is exempt.
Estimated Direct Employment	
Construction (average)	161 jobs (average per month)
Operation	11 jobs
Estimated Secondary Employment	
Construction	55 jobs
Operation	4 jobs
Estimated Direct Income	
Construction	$11.05 million
Operation	$0.83 to $1.04 million
Estimated Secondary Income	
Construction	$2.5 million
Operation	$1.17 million
Estimated Payroll	
Construction	Total-$13.4 million.
Operation	Average: $0.93 million annually.
Estimated Sales Taxes	
Construction	$170,000 to $255,000
Operation	$17,000 to $25,500 annually.
Existing Unemployment Rates	Existing – 4.4 percent in May 2004, for San Francisco PMSA, not seasonally adjusted, and 5.8 percent in May 2004, for California, not seasonally adjusted.
Percent Minority Population (6 mile radius)	57.75 percent
Percent Poverty Population (6 mile radius)	11.36 percent
Percent Minority Population (1 mile radius)	50.57 percent

The total payroll for the operation phase is estimated to be $0.9 million annually. In addition, there would be $0.25 million in local expenditures per year on materials and supplies during operation. Based on the sales tax rate (8.5 percent minus 0.25 percent to the County), sales tax revenue from locally purchased materials during operation would be between $17,000 and $25,500 (SFERP 2004a, p. 8.8-17).

[5] Table 2 uses 2003 dollars, construction is for 12 months, and project life planned for 30 years. Economic (non-fiscal and fiscal) impacts, unemployment, and population information are generally for San Francisco County. The results of IMPLAN/Input-Output modeling are for San Francisco County and show secondary, indirect and induced impacts, as well as direct impacts.

[6] Does not include combustion turbine cost. CTs acquired by City via settlement with Williams Energy.

Schools

There are over a dozen elementary, middle or high schools within two miles of the proposed SFERP. Starr King and Daniel Webster Elementary Schools, and Enola Maxwell Middle School are the closest to the project site and are administered by the San Francisco Unified School District. Current enrollment for the District as a whole has declined slightly (0.76 percent) from the 2003 school year (SFERP 2004a, p. 8.8-6).

Staff believes that most construction workers will commute to the worksite on a daily or weekly basis. Since workers would not be bringing their families for the 12-month construction period, there will not be a significant impact on local school enrollment. During the operations phase, even if all of the 11 operating employees were to relocate and live in San Francisco, which is not likely to be the case, it would not result in a significant adverse impact. Assuming an average family size of 3.03 (US 2000 Census) this would result in about 11 children added to the local schools. This would result in an insignificant increase in enrollment for the base year of 2005-2006 for the City of San Francisco. Overall, staff expects no significant socioeconomic impact on study area schools.

Education Code section 17620 states that public agencies may not impose fees, charges or other financial requirements to offset the cost for "school facilities." School facilities are defined as "any school-related consideration relating to a school district's ability to accommodate enrollment." Local and state agencies are precluded from imposing (additional) fees or other required payments on development projects for the purpose of mitigating possible enrollment impacts to schools.

Police Protection

The Amendment filing (Section 8..8.3.6.1 Law Enforcement) notes that the proposed SFERP will be served by the San Francisco Police Department (SFPD), and the Bayview station in particular. The Bayview station has about 100 sworn officers and five patrol cars. The response time to an emergency at the proposed project site is two minutes (SFPUC 2005a, p. 8.8-9). The California Highway Patrol provides law enforcement services on state highways and roads in the CCSF, including hazardous materials transportation. The SFERP would not significantly increase the existing demand for police service or adversely affect police protection in and around the SFERP area (SFERP 2004a, Appendix 8.8, Telephone Record with Lt. Juarez, SFPD, and Fatuma Yusuf, CH2MHill, on January 5, 2004).

Medical Services/Utilities

The San Francisco General Hospital is the closest (1.5 miles) full-service medical facility to the proposed site. It is licensed for 550 beds and is the designated trauma center for the west bay counties (i.e. San Mateo, San Francisco, Marin). Emergency services are available 24 hours a day. The Potrero Hill Health Center and the Concentra Medical Center are both approximately one mile from the SFERP site. In addition, St. Luke's Hospital is approximately two miles west of the SFERP and is a full-service 260 bed-licensed acute care facility.

Emergency response would be handled by police and fire personnel as needed. In addition, the San Francisco Fire Department has a Hazardous Materials Response

Team based at Engine Company 36 located at 109 Oak Street. Response time to the SFERP site is approximately 30 minutes. Additional support could come from the San Francisco Bureau of Fire Prevention, the Department of Public Health, and the U. S. Coast Guard, which has stations on Alameda and Yerba Buena Islands (SFERP 2005a, p. 8.8-10; Port of San Francisco 2005). Given the existing medical facilities and emergency services, staff believes that the medical facilities in the local area would be adequate to meet the needs of construction and operation workers.

Water and wastewater discharge are discussed in the **Water Resources** section of the Preliminary Staff Assessment (PSA). The SFERP will connect to Pacific Gas and Electric's (PG&E) electrical transmission lines and PG&E will also deliver natural gas. Adequate supplies of electricity are available for SFERP's construction, and as discussed in the PSA **Reliability** section, gas is available for SFERP's operation. Fire protection and solid waste removal are discussed in the **Worker Safety, Fire Protection and Waste Management** sections of this PSA, respectively.

Finally, the SFERP will not directly or indirectly induce substantial population growth. Hence, there are no significant socioeconomic impacts that might trigger adverse physical impacts in the provision of public services.

CUMULATIVE IMPACTS

Cumulative impacts could occur when more than one project has an overlapping construction schedule that creates a demand for workers that cannot be met by local labor, resulting in an influx of non-local workers and their dependents.

There are several projects planned for the SFERP area including residential and commercial developments, and various public works projects. For example, the combined public and private PIER 70 development project would involve new commercial and industrial activities just north of the SFERP site. However, there is no time line for the construction to begin. The San Francisco Municipal Railway (MUNI) is scheduled to begin construction of a new storage and maintenance facility about a quarter mile south of the SFERP this year, with a completion date of January 2007 (San Francisco MUNI 2004a). The MUNI is constructing a Third Street light-rail transit line about a block west of the SFERP site with completion scheduled for December 2005 SFPUC 2005a, p.8.10-26). The SFERP will begin construction in spring 2006 with commercial operation scheduled for spring 2007, so there is some potential overlap with the MUNI storage and maintenance facility project planned to begin a 30-month construction period in September 2005 (see the **Land Use** section of this PSA for more details).

Staff believes that the size of the available workforce in the San Francisco Bay area will ensure that the SFERP construction, in conjunction with other projects planned or in process, will not put a strain on the types of workers needed to complete all the anticipated projects. Finally, because the SFERP would not result in any significant adverse socioeconomic impacts to population, housing, or public services due to the small size and temporary nature of construction, it is unlikely that it would contribute significantly to cumulative socioeconomic impacts. The SFERP's impact on socioeconomics, when combined with the existing impact of other projects, is not

cumulatively considerable, and thus does not result in a significant adverse cumulative impact to socioeconomics.

DEMOGRAPHIC SCREENING ANALYSIS

The purpose of the demographic screening analysis is to determine whether a low-income and/or minority population exists within the potentially affected area of the proposed site. Staff conducted the screening analysis in accordance with the "Final Guidance for Incorporating Environmental Justice Concerns in [the Environmental Protection Agencies'] EPA's [National Environmental Policy Act] NEPA Compliance Analysis," Guidance Document (EPA 1998). Minority populations, as defined by this Guidance Document, are identified where either:

- the minority population of the affected area is greater than fifty percent of the affected area's general population; or
- the minority population percentage of the area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis; or
- one or more census blocks in the affected area have a minority population greater than fifty percent.

In 1997, the President's Council on Environmental Quality issued Environmental Justice Guidance that defines minority as individuals who are members of the following population groups: American Indian or Alaskan Native, Asian or Pacific Islander; Black not of Hispanic origin; or Hispanic. Low-income populations are identified with the annual statistical poverty thresholds from the Bureau of the Census's Current Population Reports, Series P-60 on Income and Poverty (OMB 1978).

Staff has reviewed Census 2000 information that shows minority population by census block is 57.75 percent within a six-mile radius, and 50.57 percent within one-mile of the proposed SFERP project (See **Socioeconomics Figure 1**). In addition, there are pockets (census blocks) with greater than 75 percent minority population within the six mile radius. Census 2000 data by census block group information shows that the low-income population is 11.41 percent within the same radius. Poverty status excludes institutionalized people, people in military quarters, people in college dormitories, and unrelated individuals under 15 years old.

Staff has not identified significant direct or cumulative, adverse socioeconomic impacts resulting from the construction or operation of the project. The SFERP project is proposed to be built in an urban area, would not physically alter the community, and would largely utilize a local labor force that would not create any new significant demands on community infrastructure and services. Although staff has identified minority and low-income residents within a one-mile radius of the SFERP, there are no significant adverse direct or cumulative socioeconomic impacts and no socioeconomic environmental justice issues related to this project.

NOTEWORTHY PUBLIC BENEFITS

As noted in this analysis, the SFERP will provide benefits in employment, purchase of materials, sales taxes and income for San Francisco. As discussed earlier in the **Direct/Indirect Impacts and Mitigation** section and displayed in **Socioeconomics Table 2** in detail, estimated benefits from the SFERP include increases in sales taxes, employment, and income for San Francisco and neighboring counties. For example, there are estimated to be 165 direct project-related jobs for 12 months of demolition/construction, resulting in an estimated 209 total jobs that will be created, of which 44 are secondary (indirect and induced) jobs. Secondary (indirect and induced) construction income based on an estimated $8.85 million for construction results in another $2.5 million for an estimated total income of $11.35 million from the SFERP. For operations, 11 direct jobs will be created plus four secondary jobs for a projected total of 15 jobs. Secondary operation income is estimated at $1.38 million for an estimated total annual income of $2.28 million. The total sales tax during construction is estimated to be $170,000 to $255,000.

CONCLUSIONS

Staff concludes that the SFERP would not cause a significant adverse socioeconomic impact on the study area's housing, schools, police, emergency services, hospitals, and utilities. Staff has determined that there would be no significant adverse socioeconomic impacts since most of the construction and operation workforce resides in the regional or local labor market area. Staff has determined that there would be no significant adverse direct or cumulative socioeconomic impacts, and therefore no socioeconomic environmental justice issues.

Staff does not propose any conditions of certification.

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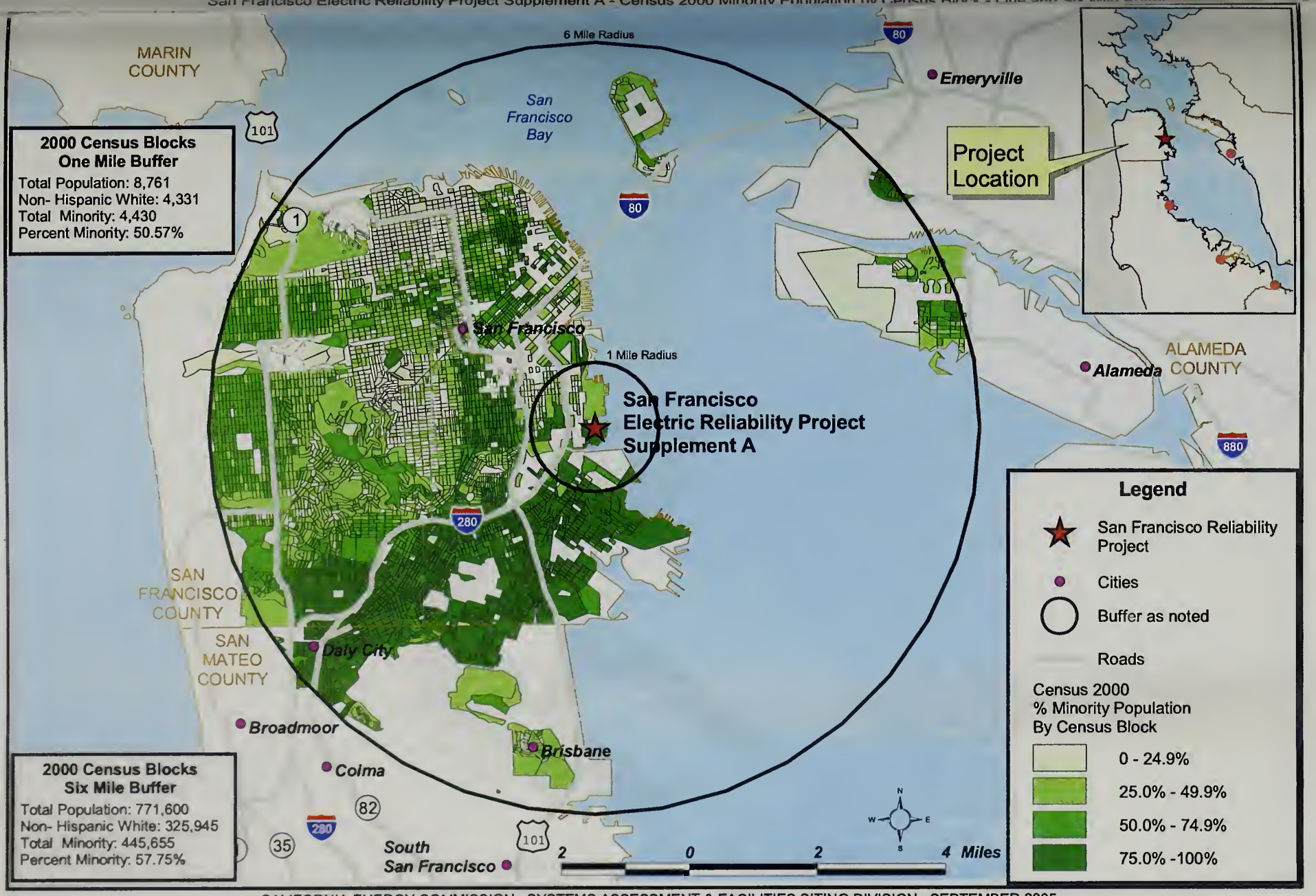
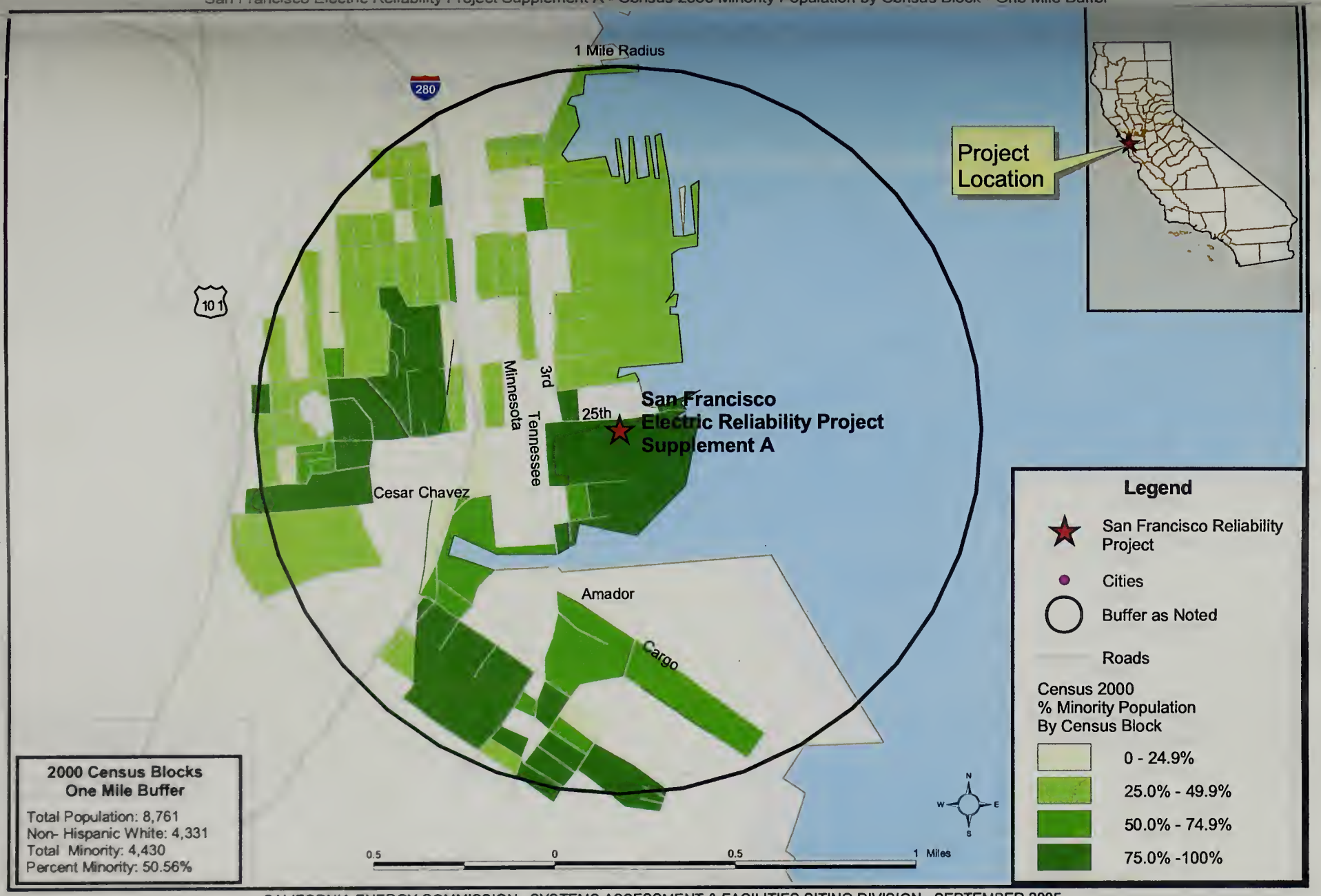


CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005
SOURCE: California Energy Commission Statewide Transmission & Power Plant Maps 2005, Census 2000 PL 94-171 Data - Matrix PL2



CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005
SOURCE: California Energy Commission Statewide Transmission & Power Plant Maps 2005, Census 2000 PL 94-171 Data - Matrix PL2

CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005
SOURCE: California Energy Commission Statewide Transmission & Power Plant Maps 2005, Census 2000 SF3

SOIL AND WATER RESOURCES

Mark Lindley, Vince Geronimo, and Philip Luecking

SUMMARY OF CONCLUSIONS

With the information provided to date, staff has determined the proposed project would result in a less than significant impact to soil and water resources. The San Francisco Electric Reliability Project would comply with all applicable soil and water resource laws, ordinances, regulations, and standards, and potentially significant impacts would be mitigated through the preparation of various construction and operating plans that would detect and correct any problems relating to soil erosion, contamination to surface and groundwater, use of potable water supplies, or non-compliance with wastewater treatment and discharge requirements. Staff is still seeking more information on soil contamination and on the use of vegetated swales prior to the release of the Final Staff Analysis. The applicant plans to perform soil and groundwater sampling during September 2005 and will provide the results prior to the Final Staff Assessment.

INTRODUCTION

This section analyzes potential impacts to soil and water resources by the San Francisco Electric Reliability Project (SFERP) proposed by the City and County of San Francisco (applicant). This analysis incorporates information available to staff as of August 30, 2005, and focuses on the following areas of concern:

- whether the project's demand for water could affect surface or groundwater supplies or local groundwater quality;
- whether the existing site has soil and groundwater contamination; and whether this possibility has been adequately accounted for in construction and operational plans;
- whether construction or operation could lead to accelerated wind or water erosion and sedimentation;
- whether the project's wastewater management practices will lead to degradation of surface or ground water quality;
- whether project construction or operation could lead to degradation of surface water quality or drainage;
- whether the project has taken precautions to avoid adverse surface water impacts during operations, i.e. from flooding; and
- whether the project will comply with all applicable laws, ordinances, regulations and standards.

Where the potential for impacts is identified, mitigation and conditions of certification have been proposed.

SOIL and WATER Table 1
Laws, Ordinances, Regulations, and Standards (LORS)

Federal LORS	
Clean Water Act (33 U.S.C. Section 1257 et seq.)	The Clean Water Act (33 USC § 1257 et seq.) requires states to set standards to protect water quality, which includes regulation of stormwater discharges during construction and operation of a facility. These are normally addressed through a general National Pollutant Discharge Elimination System (NPDES) permit. For SFERP, regulation of water quality is administered by the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB).
Resource Conservation and Recovery Act	The Resource Conservation Recovery Act (RCRA) of 1976 (40 CFR Part 260 et seq.) seeks to prevent surface and groundwater contamination, sets guidelines for determining hazardous wastes, and identifies proper methods for handling and disposing of those wastes.
40 Code of Federal Regulations, Part 423	The provisions of this part of the CFR are applicable to discharges resulting from the operation of a generating unit by an establishment primarily engaged in the generation of electricity for distribution and sale which results primarily from a process utilizing fossil-type fuel (coal, oil, or gas) or nuclear fuel in conjunction with a thermal cycle employing the steam water system as the thermodynamic medium.
State LORS	
Water Code Section 13260	Requires filing with the appropriate Regional Board a report of waste discharge that could affect the water quality of the state, unless the requirement is waived pursuant to Water Code section 13269.
Water Code Section 13552.6	Specifically identifies the use of potable domestic water for cooling towers, suitable reclaimed water is available, as a waste or unreasonable use of water. The availability of reclaimed water is determined based on criteria listed in Section 13550 by the State Water Resources Control Board. (SWRCB). Those criteria include provisions that the quality and quantity of the reclaimed water are suitable for the use, the cost is reasonable, the use is not detrimental to public health, and the use will not impact downstream users or biological resources.
State Acts, Policies, and Orders	
California Constitution, Article X, Section 2	This section requires that the water resources of the State be put to beneficial use to the fullest extent possible and states that the waste, unreasonable use, or unreasonable method of use of water is prohibited.
Title 23, California Code of Regulations, Chapter 15, Division 3	These regulations require that the Regional Water Quality Control Board (Regional Board) issue Waste Discharge Requirements specifying conditions for protection of water quality as applicable.
California Code of Regulations, Title 17	Title 17, Division 1, Chapter 5, addresses the requirements for backflow prevention and cross connections of potable and non-potable water lines.
California Code of Regulations, Title 22	Title 22, Division 4, Chapter 15, requires the California Department of Health Services (DHS) review and approve the wastewater treatment systems to ensure they meet tertiary treatment standards allowing use of reclaimed water for industrial processes such as steam production and cooling water.
California Code of Regulations, Title 23	Title 23, Division 3, Chapter 15, requires the Regional Board issue Waste Discharge Requirements specifying conditions for protection of water quality as applicable. And also Chapter 26, Wastewater Treatment Plant

	Classification, Operator Certification, and Contract Operator Registration Program which protects public health and the environment by providing for the effective operation of wastewater and water recycling treatment plants through the certification of wastewater treatment plant operators.
esolution 75-58	The SWRCB has adopted policies that provide guidelines for water quality protection. The principal policy of the SWRCB that specifically addresses the siting of energy facilities is the Water Quality Control Policy on the Use and Disposal of Inland Waters Used for Power Plant Cooling (adopted by the Board on June 19, 1975 as Resolution 75-58). This policy states that fresh inland waters should only be used for power plant cooling if other sources or other methods of cooling would be environmentally undesirable or economically unsound. This SWRCB policy requires that power plant cooling water should come from, in order of priority: wastewater being discharged to the ocean, ocean water, brackish water from natural sources or irrigation return flow, inland waste waters of low total dissolved solids, and other inland waters. This policy also includes cooling water discharge prohibitions such as land application.
WRCB Resolution 77-1	State Water Resources Control Board Resolution 77-1 encourages and promotes reclaimed water use for non-potable purposes.
WRCB Water Quality rder 92-08	Requires the SWRCB to regulate industrial stormwater discharge from construction projects affecting areas greater than 1 acre to protect state waters. Under Order 92-08 the RWQCB will issue NPDES permits for construction activities based upon an acceptable Storm Water Pollution Prevention Plan (SWPPP) submitted by the applicant.
Guidance	
alifornia Water Code ection 100	Requires the water resources of the State be put to beneficial use to the fullest extent of which they are capable, and the waste or unreasonable use or unreasonable method of use of water be prevented, and that the conservation of such water is to be exercised with a view to the reasonable and beneficial use thereof in the interest of the people and for the public welfare.
alifornia Water Code ection 100.5	Declares to be the established policy of the State that conformity of a use, method of use, or method of diversion of water with local custom shall not be solely determinative of its reasonableness, but shall be considered as one factor to be weighed in the determination of the reasonableness of the use, method of use, or method of diversion of water, within the meaning of Article X, Section 2 of the California Constitution.
alifornia Water Code ection 1254	Specifies that the SWRCB in acting upon applications to appropriate water, shall be guided by the policy that domestic use is the highest use and irrigation is the next highest use of water.
alifornia Water Code ection 13146	Requires that state offices, departments and boards in carrying out activities which affect water quality, shall comply with state policy for water quality control unless otherwise directed or authorized by statute, in which case they shall indicate to the State Water Resources Control Board in writing their authority for not complying with such policy.
alifornia Water Code ection 13247	Requires that state offices, departments, and boards, in carrying out activities which may affect water quality, shall comply with water quality control plans (i.e., Basin Plans) approved or adopted by the State Water Resources Control Board unless otherwise directed or authorized by statute, in which case they shall indicate to the appropriate Regional Water Quality Control Boards in writing their authority for not complying with such plans.

California Water Code Section 13523	Requires that a Regional Board, shall prescribe water reuse requirements for water, which is to be used or proposed to be used as recycled water after consultation with and upon receipt of recommendations from the State Department of Health Services, and if it determines such action to be necessary to protect the public health, safety, or welfare.
California Water Code Section 13550	Requires the use of reclaimed water for industrial purposes subject to reclaimed water being available and upon a number of criteria including provisions that the quality and quantity of the reclaimed water are suitable for the use, the cost is reasonable, the use is not detrimental to public health, and the use will not impact downstream users or biological resources.
California Water Code Section 13552.8	States that any public agency may require the use of reclaimed water in cooling towers if reclaimed water is available, meets the requirements set forth in Section 13550, that there will be no adverse impacts to any existing water right, and that if public exposure to cooling tower mist is possible appropriate mitigation or control is provided.
SWRCB Resolution 88-63	The Regional Water Quality Control Boards (Regional Boards) shall assure that the beneficial uses of municipal and domestic supply (MUN) are designated for protection wherever those uses are presently being attained and assure that any changes in beneficial use designations for waters of the State are consistent with all applicable regulations adopted by the Environmental Protection Agency. Where a body of water is not currently designated as MUN but, in the opinion of a Regional Board, is presently or potentially suitable for MUN, the Regional Board shall include MUN in the beneficial use designation. All surface and groundwater of the State are considered to be suitable, or potentially suitable, for municipal or domestic water supply and should be so designated by the Regional Boards with the exception of certain defined surface and groundwater suitable for exception as a source of drinking water.
SWRCB Resolution 68-16	This resolution (the "Anti-Degradation Policy") declares that it is the State's policy for maintaining existing high quality waters to the maximum extent possible. The existing high water quality must be maintained until demonstrated to the State that any proposed change will be consistent with the maximum benefit to the people of the state and will not unreasonably affect present or future beneficial uses.
The California Safe Drinking Water and Toxic Enforcement Act	This Act (California Health & Safety Code Section 25249.5 et seq.) prohibits actions contaminating drinking water with chemicals known to cause cancer or possessing reproductive toxicity. The Regional Water Quality Control Board administers the requirements of the Act.
Recycling Act of 1991 (Water Code 13575 et. seq)	States that retail water suppliers, reclaimed water producers, and wholesalers should promote the substitution of reclaimed water for potable and imported water in order to maximize the appropriate cost-effective use of reclaimed water in California.
Integrated Energy Policy Report (Public Resources Code, Div. 15, Section 25300 et seq)	In the 2003 IEPR, consistent with State Water Resources Control Board Policy 75-58 and the Warren-Alquist Act, the Energy Commission adopted a policy stating they will approve the use of fresh water for cooling purposes by power plants it licenses only where alternative water supply sources and alternative cooling technologies are shown to be "environmentally undesirable" or "economically unsound."
Local LORS	
San Francisco Public Health Code, Article 22A	Pursuant to Section 1001 of the San Francisco Public Works Code, the applicant must comply with **Article 22A** of the City and County of San

	Francisco Public Health Code, formerly known as the Maher Ordinance, which governs development of properties on fill that is known to or is suspected of containing contaminated soils. Under the San Francisco Building Code provisions, applicants for any building or grading permit which involves the disturbance of at least 50 cubic yards of soil shall comply with the requirement for soil sampling and analysis of **Article 22A** of the Public Health Code. This ordinance provides that no building permit application subject to the requirements of this section shall be approved until the Department receives written notification from the Director of Public Health that the applicant has complied with all applicable provisions of **Article 22A** of the Public Health Code, or verification that the requirements have been waived.
an Francisco Building ode, Chapter 3	The San Francisco Building Code (SFBC) adopts Chapter 33 of the Uniform Building Code (UBC) and the California Building Code (CBC), which establishes excavation, grading and erosion control standards. The standards include specifications pertaining to excavation of fills for buildings or structures, grading associated with construction of utilities, and stormwater drainage.
an Francisco Public orks Code, Article 4.1	The discharge of any industrial wastewater to the sewer would normally require approval by the City and County of San Francisco Public Utilities Commission, Bureau of Environmental Regulation and Management for a batch wastewater permit. The permit is issued pursuant to provisions of Sections 120, 124, and 125 of Chapter X (Public Works Code) of Part II of the San Francisco Municipal Code, **Article 4.1**. The purpose of this Article and the City's industrial waste pretreatment program is to protect human health and the environment by preventing the discharge of pollutants into the sewerage system that would: (i) obstruct or damage the system; (ii) interfere with, inhibit or disrupt treatment facilities and processes, or the processing, use or disposal of sludge; (iii) pass through the sewerage system and contribute to violations of regulatory requirements imposed on the City; or (iv) otherwise harm, or threaten to harm human health or the environment. The permit would limit pollutants in the wastewater to acceptable levels and require periodic sampling of the discharge. Permit applications would apply to both normal plant waste discharges and to the disposal for dewatering should the applicant select discharge to the sewer as the method for disposal.
n Francisco Public orks Code, Article 22	**Article 22** requires the installation of dual plumbing and use of recycled water, when it is available, for projects over 40,000 square feet within the reclaimed water area.
n Francisco Public orks Order No. 158170	The Order specifies industrial waste discharge limits on wastewater discharges into the City's sewer system.
n Francisco Bay Plan	The San Francisco Bay Conservation and Development Commission (BCDC) is charged with determining how the future development of the Bay should proceed and with protecting the beneficial uses and preserving San Francisco Bay. The policies, recommendations, decisions, advice, and authority of the SWRCB and SFRWQCB are the basis for carrying out BCDC's water quality responsibilities. The San Francisco Bay Plan was adopted by the Commission in 1968 and forwarded to the California Legislature and the Governor in 1969. Part 3, Water Quality, Policy 3 maintains that soil erosion reduction methods should be incorporated into the design and construction of shoreline projects in order for the Bay to be protected from increased sedimentation.

SETTING

The proposed SFERP site is a previously disturbed industrial property. The area immediately surrounding the site is predominantly industrial. The primary source of cooling and process water for the SFERP will be disinfected, recycled water from a wastewater tertiary treatment plant located on the site. It will be supplied by raw sewage from the City's combined sewer and stormwater line on Marin Street. Potable water will be supplied by the City of San Francisco. City potable water is also proposed to be used as emergency back-up water for the plant when reclaimed water is temporarily unavailable. Wastewater from the SFERP power plant and tertiary wastewater treatment plant will be discharged to the existing combined sewer system. Stormwater will also be discharged to the existing combined sewer system.

The SFERP site is located near the San Francisco Bay, in the Potrero District of the City of San Francisco (City). The project is to be located on a 4.0 acre site owned by the City with an 8.5 acre construction laydown area immediately to the east of the project site. The construction laydown area is under the jurisdiction of the Port of San Francisco and will be leased by the City. The project site is located on the eastern side of San Francisco and the western edge of San Francisco Bay (Bay). The land uses in the surrounding area are primarily industrial and commercial. The project site is bounded by 25th Street to the north, developed property along the north side of Cesar Chavez Street to the south, undeveloped Maryland Street and the construction laydown area to the east, and the proposed MUNI Metro East Light Rail Vehicle Maintenance and Operations Facility (MUNI site) to the west.

The site is currently occupied by a portable concrete batch pant and other temporary buildings. All permanent structures have been removed from the site and all temporary structures will be removed prior to construction. The construction laydown area is currently vacant. The project site and construction laydown areas were historically part of a railway switchyard operated by Western Pacific Railroad (SFPUC 2005a).

The average annual precipitation for San Francisco is 21 inches, with the majority of the rainfall occurring between November and April. Average monthly temperatures range from lows in the mid-40s (°F) to highs in the mid-60s.

Soil

The gas, domestic water and electrical connections will be made to existing facilities adjacent to the SFERP site and the proposed wastewater pipeline for supplying process water will follow existing roadways and rights-of-way.

The entire project site and the adjacent construction laydown area are located in soil mapping unit 134 and is described as areas that were formerly part of San Francisco Bay and its adjacent tidal flats. The soil mapping unit is defined as Urban Land-Orthents, Reclaimed Complex, 0 to 2 percent slopes, in the Soil Survey of San Mateo County, published by the Natural Resources Conservation Service (NRCS). The majority of this soil unit is urban land with a smaller portion being Orthents, which are soils consisting of highly variable fill material. The fill material may consist of any combination of soil, gravel, concrete, solid waste and Bay Mud. This soil has a soil

capability class of VIII and is not suitable for crop production and there is low erosion potential (SFPUC 2005a). There are no agricultural land uses within the SFERP project site or vicinity.

Areas to the west and north of the general project vicinity, where site linears will be installed, are classified as soil mapping unit 131, Urban Land, 0 to 30 percent slopes. A portion of the collection box that will connect the wastewater pump station and process water supply line to the SFERP site is located within this unit. This soil unit includes areas in which more than 85 percent is covered by paved areas, buildings, and other structures (SFPUC 2005a).

Soil characteristics of concern at the project site are the potential for a high water table and the potential for subsidence. The high water table could affect excavation activities, requiring dewatering. Subsidence is possible in areas containing mostly fill material and could impact the foundation of the structures at the site. Given the industrial history of the site and surrounding properties, there is a significant possibility of encountering contaminated soil materials during drilling and excavation consisting of heavy metals, polynuclear aromatic hydrocarbons and residues from a former manufactured gas plant (SFERP2004a).

Surface Water

There are no surface waters located within the boundaries of the project site or construction laydown area. The two surface bodies of water located in vicinity of the project site include San Francisco Bay and Islais Creek. The project site is approximately 500 feet from the western shore of San Francisco Bay.

Islais Creek Channel is located less than 1,000 feet to the south of the project site. Islais Creek formerly carried the runoff of several small drainages in the southeast portion of San Francisco to San Francisco Bay including Islais Creek Estuary. Following urban development of the area, Islais Creek and Estuary were filled and the creek was piped such that natural flows were diverted to the combined sewer system. Presently, surface runoff to Islais Creek results mostly from direct runoff from areas adjacent to the creek. The Islais North, Marin Street, and Selby Street combined sewer system overflow structures also openly discharge, or daylight, at Islais Creek. The Southeast Water Pollution Control Plant (SEWPCP) also pipes its treated effluent across Islais Creek to the Bay off of Pier 80.

Flooding and Tsunami

Both the project site and laydown area are relatively flat with surface elevations ranging from approximately 10 feet to 14 feet NAVD (North American Vertical Datum 1988). The post construction elevations of the SFERP site will range from 12 to 14 feet NAVD. The highest recorded tide in the project area is 9.25 feet (SFPUC 2005a), which does not account for wave run-up. The 100-year tide elevation, including the effect of wind-generated wave run-up at MHHW (MHHW = mean higher high water, or the average level of the higher of the two daily high tides) is 13.0 feet above mean sea level. Flooding along the City's San Francisco Bay waterfront has the potential to impact the current SFERP site. The site may also be impacted by an increase in Bay water levels caused by a tsunami, although the probability of occurrence is low. The San Francisco

Community Safety Element indicates that there are no areas prone to surface flooding in San Francisco (SFERP 2004a).

Groundwater

The project site is located within the Islais Creek groundwater basin, which extends from Twin Peaks, approximately 3.5 miles west of the project site to the Bay. The material located beneath the project site is generally fill material placed on top of Bay Mud. The fill material consists of loose sand and gravel locally excavated and man made materials including but not limited to concrete, asphalt, wood, ceramics, and other construction debris. The fill material ranges in depth from approximately 8 to 31 feet, below existing grade. The fill is underlain by Bay Mud extending to depths of approximately 50 feet. Stiff sandy silty clay and silty clayey sand extend below the Bay Mud to Franciscan bedrock at a depth of over 200 feet (SFERP 2005p).

Groundwater elevation measurements were taken near the project site during a site characterization of the adjacent MUNI site in 1999. Results of these measurements indicate that the water table is shallow with a depth to groundwater of approximately 6.3 to 7.6 feet below the ground surface. Groundwater generally flows to the east through the project site with a relatively flat gradient (0.001 to 0.00001 feet/foot) (SFERP 2005p). It is likely that groundwater will be encountered during some construction activities which will necessitate dewatering in most cases.

Soil & Groundwater Contamination

Soil and groundwater contamination investigations were also performed by AGS Inc. in 1999. Results of the sampling found the presence of soil and groundwater contamination at the adjacent MUNI site, which is a brownfield site (SFERP 2005n). Total petroleum hydrocarbon (TPH) as diesel/motor oil/bunker oil, arsenic, lead, other metals and semi-volatile organic compounds were found in the soil and groundwater at the adjacent MUNI site (SFPUC 2005p). It is likely that the SFERP site contains soil contamination similar to that found at the adjacent MUNI site, based on the similarity of historical activities at two sites and their adjacency.

Groundwater sampling at monitoring wells located west (up gradient) of the SFERP site and near the northeast corner (down gradient) of the SFERP site was conducted as part of the MUNI site investigation. Results of the sampling found low concentrations of TPH compounds, lead, and arsenic to be present in the groundwater both up gradient and down gradient of the SFERP site. These sample results indicate a high likelihood that the SFERP site may have areas of significant soil contamination.

Project Water Supply

The SFERP facility operations require water for cooling towers, nitrogen oxide (NO_x) emission control and compressor evaporative cooling. Water is also necessary for equipment washing, potable water, and fire protection.

Staff has received a copy of a will-serve letter from the City of San Francisco Public Utilities Commission, Water Pollution Control Plant stating up to 500 gallons per minute of raw sewage can be withdrawn from the City's Combined Sewer System to treat and reclaim as process water to the SFERP wastewater treatment plant (SFERP 2004q).

Staff also has a will-serve letter from the City of San Francisco Public Utilities Commission stating the location of an existing 8-inch water main in 23rd Street. Potable water demand will meet the Water Department rules and regulations governing water service to customers. The applicant has not shown that the expected emergency backup water peak flow and volume meet the Water Department rules and regulations. Water for fire protection will be served from the City's potable water supply with additional backup from the City's Auxiliary Water Supply System (AWSS). The source of water for the AWSS is City water but the system is considered to be nonpotable (SFERP 2005n). Fire protection needs would be approved by the Department of Building Inspection.

The raw sewage would be obtained from a sewer main pipeline at an eight by ten-foot distribution box at Marin Street, west of Interstate 280. The applicant reports that wastewater dry weather flows in this portion of the combined sewer system average over one million gallons per day (mgd), and wet weather flows can be much higher, ranging over 100 mgd (SFERP2004r). The existing combined sewer serves primarily residential areas. The process water pipeline to the SFERP site would travel approximately 0.76 mile via Mississippi Street, Cesar Chavez Street, and Maryland Street. Potable water would be delivered by a short (approximately 300 feet) pipeline in Maryland Street (Section 2, SFERP2005a).

The SFERP would include a new underground wastewater pump station (WPS) within an existing combined sewer system structure on Marin Street. The WPS would include facilities to remove floatable matter and large debris prior to discharge into the process water pipeline to SFERP. Excess flow and debris would be returned to the combined sewer system (Section 7, SFERP2004a). Vacuum/air release valves would be placed at high points along the pipeline, at locations that have not yet been determined. Although the process water pipeline between the WPS and SFERP would flow under full pressure, the applicant expects momentary air releases to be minimized (SFERP2004r). The pump station would be operated remotely by the SFERP wastewater plant's Supervisory Control and Data Acquisition (SCADA) system, and monitored by its operator.

Project Water Treatment

The on-site wastewater treatment plant would be a fully automated facility, housed in a pre-engineered building at the southeast corner of the site, adjacent to the existing power plant. The SFERP recycled water plant would include primary (solids removal), secondary (activated sludge), and tertiary (filtration and disinfection) treatment. The sludge produced during secondary treatment will be returned to the City's combined sewer system. An activated carbon adsorption system would provide control of odors ventilated from the building (Data Responses 109-111, SFERP2004r). The applicant has designed the system to treat wastewater according to Title 22 (California Code of Regulations) standards to serve as disinfected, tertiary recycled water to meet all non-potable needs at the SFERP (SFERP 2004a). Staff is in agreement with the process used to clean the water as described in Section 8.14 of the AFC (SFERP 2004a) and further defined in the Data Responses, Set 1B (SFERP 2004r).

The applicant would determine if redundant units would be needed during the detailed design phase (Data Response 99, SFERP2004r). Process water used for air emission control systems and compressor evaporative cooling will be further treated using reverse osmosis and electrodeionization systems.

The expected full flow capacity of the wastewater treatment plant would be 0.6 mgd or 408 gallons per minute. The recycled water plant would operate continuously, however, the output would vary from zero to 100 percent of capacity depending on current plant demand (SFERP2004g). The applicant proposes the use of a storage tank for treated water with a capacity of approximately 600,000 gallons. The tank would be sufficient to allow approximately 36 hours of operation of the power plant if the wastewater treatment facility is temporarily off-line (SFERP2004r). When the treated water storage tank is full, treated wastewater would bypass the storage tank for discharge directly to the combined sewer system (SFERP2004r). Potable water would be used as process water if an extended power outage at the WPS causes the treated water storage tank to be depleted.

The recycled water will primarily be used for cooling towers and air emission control using NO_x suppression injection and compressor evaporative cooling. The NO_x suppression injection and compressor water will require additional chemical treatment. The NO_x suppression injection and compressor evaporative cooling water will be treated with a reverse osmosis system. Wastewater generated by the water treatment plant, reject water from the reverse osmosis system and plant domestic wastewater will be delivered to the City's combined sewer system where it will flow to the Southeast Water Pollution Control Plant (SEWPCP) for treatment.

A certified recycled water operator or a qualified site supervisor shall be assigned to the SFERP treatment facility to ensure proper operation in accordance with Title 23 of the California Code of Regulations.

Wastewater and Storm Water

The City of San Francisco (City) is the only major municipality in California with a combined sewer system. This means that throughout the City, domestic sewage, industrial wastewater, and stormwater runoff are collected in the same set of pipes where they are combined and transported to the same wastewater treatment facilities for treatment and disposal. The City combined sewer system is subject to the regulations of, and permitted under, the National Pollutant Discharge Elimination System (NPDES) program of the Clean Water Act for the treatment and disposal of the combined wastewater. However, during wet weather, the NPDES permit indicates that the City's combined sewer system facilities are regulated under the Federal Combined Sewer Overflow Control Policy, and not the same regulations for publicly-owned treatment works or for stormwater as other California municipalities with separate systems.

Wastewater from the SFERP will be discharged to the combined sewer system and treated at the South East Water Pollution Control Plant. The combined sewer system is already regulated under the NPDES program for the treatment and disposal of the combined wastewater.

Under the new Port of San Francisco storm water best management practices, the storm water generated on the SFERP site will be discharged into the bay through the use of vegetated swales. Storm water from the site will sheet flow easterly to a vegetated swale that will flow northward into the bay (SFERP 2005hh). Storm water runoff from the SFERP site and adjacent laydown area will be regulated under an NPDES permit (Figure 2-1, SFERP2004a). However, it is unclear if SFERP will be covered under the existing Port of San Francisco NPDES permit or if the project will need to obtain a separate NPDES permit.

Water Quality

The quality of the wastewater proposed for discharge from the SFERP into the City's combined sewer system compared to the City of San Francisco's industrial discharge limits is summarized in **Soil & Water Table 2** as follows:

SOIL & WATER TABLE 2
Comparison of SFERP's Wastewater Discharge Quality vs. City Discharge Limits

Constituent	SFERP's Expected Wastewater Discharge Quality	City Discharge Limits
4,4 DDE	0.006 µg/L	N/A
Arsenic	4.0 µg/L	4.0 mg/L
Biological Oxygen Demand	<5 mg/L	N/A
Cadmium	0.6 µg/L	0.5 mg/L
Chromium	2.6 µg/L	5.0 mg/L
Copper	29.2 µg/L	4.0 mg/L
Cyanide	N/A	1.0 mg/L
Dieldrin	0.004 µg/L	N/A
Dissolved sulfides	N/A	0.5 mg/L
Hydrocarbon oil and grease	<10 mg/L	100 mg/L
Lead	5.0 µg/L	1.5 mg/L
Mercury	0.04 µg/L	0.05 mg/L
Nickel	7.8 µg/L	2.0 mg/L
pH, pH units	6.0 - 9.0	6.0 – 9.5
Phenols	N/A	23.0 mg/L
Polynuclear aromatic hydrocarbons (PAHs)	0.32 µg/L	N/A
Polychlorinated biphenyls	0.20 µg/L	N/A
Selenium	0.10 µg/L	N/A
Silver	2.0 µg/L	0.6 mg/L
Temperature	70°F	125°F
Total recoverable oil and grease	<10 mg/L	300 mg/L
Total Suspended Solids	<10 mg/L	N/A
Zinc	124 µg/L	7.0 mg/L

Sources: SFERP 2004a, Tables 8.14-2 and 8.14-8

Additionally the SFERP shall meet the requirements set forth in 40 CFR Part 423 for copper and Polychlorinated biphenyls (PWA 2005b). There shall be no discharge of polychlorinated biphenyl compounds. The federal discharge limits are more strictly regulated than the City's discharge limits with the following effluent limitations cited in 40 CFR Part 423:

Constituent	Effluent Limit (mg/L)
Copper	1.0
Polychlorinated biphenyls (PCB)	0.0

The quality of the disinfected tertiary recycled water supply proposed after treatment of the wastewater is characterized in **Soil & Water Table 3**.

Project Backup Water Supply

Potable water supplied by the City of San Francisco is proposed as emergency back-up water for the plant when reclaimed water is temporarily unavailable. Potable water delivered to San Francisco is from the Hetch-Hetchy water supply system and provided by the San Francisco Public Utilities Commission. The raw water source originates outside the City, with about 85 percent originating from the Tuolumne River watershed in the Sierra Nevada and about 15 percent from local Bay area watersheds.

SFERP Site Construction

Construction of the SFERP facility will include soil excavation, grading, and installation of necessary utility connectors to the SFERP site. During site excavation and site construction, it is possible that groundwater will be encountered and dewatering activities may be required. The dewatering water would be discharged to the City's combined sewer system (SFERP 2005n). All excavation and handling of excavated materials at the project site and along the linear connectors would be conducted in accordance with a Site Mitigation and Implementation Plan (SMIP). A draft SMIP was not available for staff review as of August 30, 2005.

Construction of Associated Linear Features

The construction methods planned for the construction of linear features will expose soils and create the potential for erosion resulting from wind and runoff. Natural gas would be supplied to the SFERP via a connection to an existing PG&E transmission line. The new pipeline would be constructed using open trench excavation methods along the proposed alignment (SFERP 2005a). An underground electric transmission line would be constructed from the switchyard in the northwest corner of the site to the eastern portion of PG&E's Potrero 115 kV Substation switchyard, north of the site. A new pipeline would be constructed to deliver untreated process water from the new wastewater pump station. Trenchless methods would also be used in lieu of open trenching, as feasible. The pipeline would then head north from Cesar Chavez and enter the project site at the southeast corner. A new potable water supply line would be constructed to connect the SFERP facilities to an existing potable water supply line located in 25th Street.

SOIL & WATER TABLE 3
Estimated Recycled Water Quality

Constituent	Recycled Water (mg/L except as noted)
4,4 DDE	0.003 µg/L
Alkalinity-Bicarbonate	-
Alkalinity-Total	185
Aluminum	-
Ammonia	<5
Arsenic	2.0 µg/L
Barium	-
Biological Oxygen Demand	<10
Boron	-
Cadmium	0.3 µg/L
Chemical Oxygen Demand	<50
Chloride	150
Chromium	1.3 µg/L
Copper	14.6 µg/L
Dieldrin	0.002 µg/L
Dissolved sulfides	-
Fluoride	-
Hardness-Calcium	-
Hardness-Magnesium	-
Hardness-Total	-
Hydrocarbon oil and grease	<5
Iron	-
Lead	2.5 µg/L
Manganese	-
Mercury	0.02 µg/L
Molybdenum	-
Nickel	3.9 µg/L
Nitrate Nitrogen	15.0
pH, pH units	6.0 - 9.0
Polynuclear aromatic Hydrocarbons (PAHs)	0.16 µg/L
Polychlorinated biphenyls	0.10 µg/L
Potassium	-
Selenium	0.5 µg/L
Silica	13.0
Silver	1.0 µg/L
Sodium	-
Specific conductance, umhos/cm	-
Sulfate	120
Total Dissolved Solids	400
Total recoverable oil and grease	<5
Total Suspended Solids	<3
Turbidity, NTU	0.2
Zinc	61.8 µg/L
Temperature	20 °C

Source: SFERP 2004g, Table 8.14-10

The sanitary sewer discharge line and tie-in location were identified in response to informal data request S&W6-8 (SFERP 2005w). A new wastewater discharge pipeline will be installed along Maryland and Cesar Chavez Streets and will tie in to a new 30-inch combined sewer stub out location. A 66-inch combined sewer main on Illinois Street carries wastewater and storm water to the Southeast Water Treatment Control Plant (SFERP 2005hh). This line will likely have capacity for the SFERP waste discharge volume requirements (PWA 2005a).

As planned, no surface water features would be crossed and construction would not result in disturbance to water supplies for these linear features. Trenchless methods may inadvertently impact existing underground utilities. Care shall be taken by the linea utility construction contractor to locate all underground utilities. The existing combined sewer box along 3rd Street may be particularly difficult to cross since there are many existing utilities above the box (PWA 2005a).

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

This project was analyzed to determine if it complies with LORS and meet the standard found in relevant documents such as CEQA Guidelines. The threshold of significance is based upon the ability of the project to be built and operated without violating erosion, sedimentation, flood, surface or groundwater quality, water use (supply) or wastewater discharge standards. For example, if a water body is already impaired (under Clean Water Act, section 303d), any additional degradation of that water body would be considered a significant impact.

The Federal and State LORS and State and Local Policies presented in Soil & Water Table 1 were used to determine the threshold of significance for this proceeding. The following LORS and State and Local Policies are of particular relevance for determining the significance of a potential impact. For those impacts that exceed the published standards, or do not conform to the established practices, mitigation will be proposed b staff to reduce or eliminate the impact.

- The Clean Water Act requires states to set standards to protect water quality through the regulation of point source and certain non-point source discharges to surface water.
- The Resource Conservation Recovery Act of 1976 seeks to prevent surface and groundwater contamination.
- Under Title 22 of the California Code of Regulations, the Department of Health Services reviews and approves wastewater treatment systems to ensure they meet tertiary treatment standards allowing use of reclaimed water for industrial processes such as steam production and cooling water.
- San Francisco Public Health Code Article 22A governs development of properties located in the filled lands adjacent to San Francisco Bay with respect to hazardous waste materials that could be encountered during construction.

- San Francisco Building Code establishes excavation, grading and erosion control standards.
- San Francisco Public Works Code, Article 4.1 regulates all discharges to the City's combined sewer system.
- San Francisco Public Works Order No. 158170 specifies industrial waste discharge limits on wastewater discharges into the City's sewer system.
- San Francisco Public Works Code, Article 22 requires the installation of dual plumbing and use of recycled water, when available, for projects over 40,000 square feet within a reclaimed water area of the City.

DIRECT/INDIRECT IMPACTS AND MITIGATION

The direct and indirect impact and mitigation discussion presented below is divided into a discussion of impacts related to construction and operation. For each potential impact discussed, the applicant's proposed mitigation is presented and staff's determination of the adequacy of the proposed mitigation is discussed. If necessary, staff presets additional mitigation measures and refers to specific conditions of certification related to a potential impact and the required mitigation measures.

Construction Impacts and Mitigation

Soil

Construction activities can lead to adverse impacts to soil resources including increased soil erosion, soil compaction, loss of soil productivity, and disturbance of saturated soils. Accelerated wind and water-induced erosion may result from earthmoving activities associated with construction of the proposed project. Activities that expose and disturb the soil leave soil particles vulnerable to detachment by wind and water. Soil erosion results in the loss of topsoil and increased sedimentation of surface waters downstream of the site or increased sediment load to the sewer system. The magnitude, extent and duration of these impacts would depend on several factors, including the proximity of the site to surface water, the soils affected, and the method, duration, and time of year of activities. Prolonged periods of precipitation, or high intensity and short duration runoff events coupled with earth disturbance activities can result in on-site erosion, eventually increasing the sediment load within nearby receiving waters. In addition, high winds during grading and excavation activities can result in wind borne erosion leading to increased particulate emissions that adversely impact air quality. Implementing appropriate erosion control measures will help conserve soil resources, maintain water quality, protect property from erosion damage, prevent accelerated soil loss, and protect air quality.

The SFERP site would be constructed on 4.0 acres. An additional 8.5 acres would be disturbed for the construction laydown area. Less than 1.0 acre of soil would be disturbed for installation of linear facilities. During construction activities the SFERP site surface would be stripped of vegetation, gravel or pavement and would have an increased potential for erosion. The laydown area is flat exposed soil that would not require grading and would be covered with gravel. The gravel layer would protect the

exposed soil from wind and water and would serve as a mitigation measure to reduce erosion.

The applicant believes that the relatively flat site and surrounding developed areas, and the use of construction best management practices (BMPs) will reduce the potential for soil loss and erosion to a negligible level. BMPs for SFERP identified by the applicant could include mulching, physical stabilization, dust suppression, berms, ditches, and sediment barriers (SFERP 2005a).

The applicant estimated that between 12.6 to 13.6 tons of soil could be eroded during 10 months construction and between 4.0 and 4.6 tons of soil could be eroded during 2 months of active grading at the SFERP site, the laydown area, and associated linears. With the implementation of BMPs to limit erosion and trap eroded sediments, the applicant estimated that the soil loss from the site as a result of water erosion could be reduced to existing levels of approximately 0.5 to 0.6 tons per year. Because adequate steps will be taken as part of the design review process (specifically, the development of a Drainage, Erosion and Sedimentation Control Plan (DESCP)) consistent with **SOIL & WATER-1**, staff believes that soil loss and erosion is not considered to be a significant problem for the proposed SFERP during construction.

Staff agrees that proper application of BMPs can reduce the impact to soil resources from water erosion to a level that is less than significant. Conformance with the procedures in an approved DESCP will prevent erosion and migration of soils from the SFERP site into the San Francisco Bay and the City's combined sewer system. Staff has reviewed the draft SWPPP for Construction Activity and the requirements of San Francisco Public Health Code Article 22A, and San Francisco Public Works Code Article 4.1. These documents require the applicant to mitigate for, test and monitor soil and runoff from the site. Sedimentation control measures such as barriers or fiber rolls will be installed at location where offsite drainage is possible, however, barriers will not surround the entire site. The mitigations for soil erosion include but are not limited to silt fence, sand bags, hay bales, geotextiles, straw bundles, dust control, and stockpile management. The applicant shall also use care when identifying the vehicle wash locations to ensure that the runoff from the wash process does not impact adjacent properties or the Bay.

Wind erosion can also lead to adverse soil impacts through the loss of topsoil, and fugitive dust from site grading can lead to adverse impacts to air quality due to increased suspended particulate matter. The applicant proposes to employ BMPs including watering the site at least twice daily and enclose, cover, water, or treat soil stock piles to limit soil loss due to wind erosion (SFERP 2005a). The applicant estimated that soil loss due to wind erosion during grading and construction would result in approximately 6.7 tons of PM10 emissions (PM10 refers to suspended particulate matter less than 10 microns in diameter) without the proposed BMPs. With the proposed BMPs, the applicant estimated that PM10 emissions would drop to approximately 2.6 tons.

Given the 4-acre site and 8.5-acre laydown area, the mitigated soil loss would reduce adverse soil impacts to less than significant level. However, given the proximity of the SFERP site to surrounding industrial and commercial properties that currently

experience impaired air quality, the increase in PM10 emissions from wind erosion could lead to adverse cumulative air quality impacts. These air quality impacts could be further exacerbated by existing hazardous materials To limit the potential for air quality impacts related to wind erosion, the applicant will need to adhere to the requirements of conditions of certifications **AIR QUALITY AQ-SC 2, AQ-SC 3, and AQ-SC 4** including:

- Preparation of an Air Quality Construction Mitigation Plan (AQCMP),
- Continuously monitoring for dust emissions and implementing more intensive and additional measures of dust suppression when necessary during construction, and
- Submission of a monthly compliance report during construction.

If the requirements of conditions of certification **AIR QUALITY AQ-SC 2, AQ-SC 3, and AQ-SC 4** met, staff believes that the impact to soil resources and air quality from wind erosion would be reduced to a level that is less than significant.

The SFERP would also have to meet the requirements of Article 22A of the San Francisco Public Health Code because the site is located on filled land adjacent to the San Francisco Bay with a potential for contaminated and/or hazardous waste materials to be encountered during construction. The major requirements of Article 22A have been stated in Supplement A, Section 8.9.4.2.1 (SFPUC 2005a). The statuses of these activities are summarized as follows:

- The applicant plans to utilize existing site history reports prepared for the MUNI site located adjacent and west of the project site and plans to prepare a site history for the project site and portions of the wastewater line that are bayward of the historic high tide line (SFERP 2005a).
- The applicant plans to utilize previous reports on existing soil investigations conducted at the MUNI site located adjacent and west of the project site, and plans to conduct a site-specific soil analysis and provide related reports for the SFERP site and along the linear alignments (SFERP 2005a).
- Once the site-specific soil analysis has been completed and reported, the applicant will complete a Site Mitigation and Implementation Plan.
- The Certification Report will be submitted to the San Francisco Department of Public Health (SFDPH) and the SFBRWQCB (SFERP 2004g).

The applicant stated in the AFC and the Draft SWPPP that it will manage excavated material in accordance with the Site Mitigation and Implementation Plan (SMIP) (SFERP 2005a and 2005m). The SMIP should be prepared consistent with **SOIL & WATER-6** and **WASTE-7.** A deed restriction currently in place for the MUNI property that requires compliance with a site specific Risk Management Plan and Safety Management Plan (RMP/SMP) will need to be extended to the SF ERP site (**WASTE-7**). The RMP/SMP 1) assesses potential environmental and health and safety risks; 2) recommends mitigation measures, if any are necessary, that would be protective of workers and visitors to the SFERP facility; 3) recommends measures to mitigate the

risks identified; 4) identifies appropriate waste disposal and handling requirements; and 5) presents criteria for on-site reuse of soil. The recommended measures will prevent the spread of any contaminated soil or groundwater if encountered during construction (SFERP 2005a).

Upon completion of earth-disturbing activities, the applicant would prepare a Certification Report consistent with **SOIL & WATER-7** stating whether all mitigation measures recommended in the SMIP have been completed and how completion of the mitigation measures were verified through follow-up soil sampling and analysis, if required. Also see **WASTE-7** for more information on SMIP conditions of certification, and **WASTE-1, 2, and 5** for requirements related to the potential for hazardous materials to be encountered during construction grading and earthmoving activities.

In addition to conditions of certification **SOIL & WATER-1, 6 and 7** described above, **SOIL & WATER-2 and 3** have also been included to ensure impacts to soil resources are mitigated. **SOIL& WATER-2** requires the project owner to prepare a Storm Water Pollution Prevention Plan (SWPPP) for all project features including the SFERP site, laydown area and linear features, and to file notice to the State Water Resources Control Board that it intends to support construction activities at the laydown area under a General NPDES Permit for Storm Water Discharges Associated with Construction Activity. Implementation of the SWPPP would prevent dispersion of any pollutants from stormwater runoff to soils, San Francisco Bay and to the City's combined sewer system. **SOIL& WATER-3** requires the project owner to comply with the requirements found in San Francisco Public Works Code, Article 4.1 which is overseen by the City Bureau of Environmental Regulation and Management (BERM). The project owner must ensure any discharges are in accordance with San Francisco Public Works Code, Article 4.1 for discharge of non-hazardous wastewater during construction.

With the implementation of these conditions of certification, staff concludes that the project will mitigate the construction impacts to soil resources.

Stormwater Runoff and Surface Water Quality

Potentially significant water quality impacts could occur during construction excavation and grading activities if contaminated or hazardous soil or groundwater, or other hazardous materials used during construction were to contact stormwater runoff and drain offsite into San Francisco Bay or to the City's combined sewer system. Water quality could also potentially be diminished if the stormwater drainage pattern concentrates runoff in areas that are not properly protected with best management practices causing erosion of soils into the City's combined sewer system or San Francisco Bay.

The project site is currently unpaved and partially covered by vegetation and gravel so that runoff either percolates into the soil or flows overland offsite where it drains to the Bay. During construction, drainage and sedimentation control measures will limit the discharge of sediment from the site. Post construction drainage is intended to direct flows to vegetated swales that will route storm water runoff to San Francisco Bay under the SFERP's NPDES construction and operational permits. There would be an increase in the total volume of runoff from the project site and laydown area.

During construction, the applicant would be required to develop and submit for review to the City BERM, a Drainage, Erosion and Sediment Control Plan (DESCP) outlining a strategy to prevent the off-site migration of sediment and other pollutants and to manage runoff from the construction site to the combined sewer system. During construction, the City would conduct periodic inspections to ensure compliance with the DESCP. The City's pollution prevention program requires best management practices to minimize the amount of pollutants carried by stormwater to the combined sewer system.

Staff believes that the volume of stormwater runoff will increase as a result of construction activities. The 4.0-acre project site is currently unpaved. Site construction would alter the existing drainage patterns and result in 100 percent impervious surface resulting in increased runoff volumes. No significant change would occur to the 8.5-acre laydown area, as the site will be covered by gravel that may be removed or left in place following construction. Preparation of the SWPPP for Construction Activities in compliance with **SOIL & WATER-2** for all project elements, including the SFERP site, laydown area, and linear facilities, would assure that from the perspective of volume and drainage patterns, stormwater runoff would not affect water quality to either San Francisco Bay or the City's combined sewer system.

Stormwater runoff from the 8.5-acre project laydown area, which currently drains into San Francisco Bay, is not expected to cause an adverse effect to water quality because there is no excavation or grading proposed for the laydown area that could encounter contaminated soils or groundwater. The laydown area would be covered with gravel to reduce soil erosion. Because the site would discharge storm water runoff to the Bay, the project owner must comply with the General NPDES Permit and the Stormwater Management Plan held by the Port of San Francisco. The NPDES Permit regulates stormwater effluent limitations, specifies monitoring and reporting requirements, and requires preparation and implementation of a SWPPP for construction activities.

Construction Wastewater

Construction wastewater generated onsite may include stormwater runoff, groundwater from dewatering, equipment washdown water, and water from pressure testing the service utilities. Improper handling or containment of construction wastewater could cause a broader dispersion to soil, groundwater or surface water of any contaminants encountered. A potential significant impact to water quality during the course of construction could result from stormwater runoff encountering contaminated soil or groundwater during excavation and grading activities. Stormwater runoff from contaminated areas may diminish the quality of stormwater entering the City's combined sewer system and making treatment at the SEWPCP more difficult. This discharge could contain increased pollutant levels over the current condition, and could include constituents considered hazardous. During the wet season, the combined sewer system may become surcharged when runoff exceeds the capacity of the combined sewer system and discharges through a combined sewer overflow structure, allowing contaminated runoff from the site to enter the Bay.

SFERP has proposed to comply with the Risk Management Plan/Site Management Plan (RMP/SMP), which is approved by the San Francisco Bay RWQCB for the adjacent MUNI property under San Francisco Public Health Code, Article 22A. Staff recommends

the project owner be required to provide evidence to the CPM that the City and the SFBRWQCB has agreed to extend the MUNI RMP/SMP to the SFERP site prior to site mobilization as specified in condition of certification **WASTE-7**. No significant impacts to water resources are expected from the discharge of construction water provided conditions of certification **SOIL & WATER-7** and **WASTE-7** have been met.

During construction, construction wastewater and stormwater runoff will be managed to maintain compliance with the required Erosion and Sediment Control Plan and Construction SWPPP, consistent with conditions of certification **SOIL & WATER-1** and **SOIL & WATER-2**, respectively in addition to compliance with the requirements of the RMP/SMP. The RMP/SMP requires sediment and erosion controls to prevent soil runoff, using best management practices. Dewatered water and other construction wastewater such as equipment washdown are required to be controlled for subsequent offsite disposal under the RMP/SMP (SFERP 2005a). The discharge of any non-hazardous wastewater during construction other than stormwater must be in compliance with City regulations regarding the discharge to the combined sewer system. Hazardous wastes generated during construction will be contained and moved daily to the 90-day hazardous waste storage area, located on-site.

The following conditions of certification will assure that there is no significant degradation to water quality resulting from stormwater and construction dewatering flows. **SOIL & WATER-1** requires planning and implementation of best management practices for grading and erosion control during construction and will be further described in the applicant's site specific Drainage, Erosion and Sediment Control Plan. **SOIL & WATER-2** requires the project owner to prepare a Storm Water Pollution Prevention Plan (SWPPP) for all project features including the SFERP site, laydown area and linear features, and to file notice to the State Water Resources Control Board that it intends to support construction activities at the laydown area under a General NPDES Permit for Storm Water Discharges Associated with Construction Activity. **SOIL & WATER-3** requires the project owner to comply with the requirements found in San Francisco Public Works Code, Article 4.1 which is overseen by the City Bureau of Environmental Regulation and Management (BERM). The project owner must ensure any discharges are in accordance with San Francisco Public Works Code, Article 4.1 for discharge of non-hazardous wastewater during construction.

SOIL & WATER-6 requires the project owner to submit for comment to the San Francisco Department of Public Health and SFBRWQCB its Site Mitigation and Implementation Plan (SMIP) for treating contaminated soil and water should it be encountered during project construction. The SMIP is to be prepared in accordance with San Francisco Public Health Code Article 22A. **SOIL & WATER-7** requires the project owner to prepare a Certification Report stating that all mitigation measures recommended in the SMIP have been completed and that completion of the mitigation measures has been verified through follow-up soil sampling and analysis, if required.

Approval and implementation of these plans consistent with conditions of certification **SOIL & WATER-1, 2, 3, 6 and 7** will mitigate potential erosion, sedimentation or contamination impacts to water quality to less than significant levels and will be consistent with the Clean Water Act and the City and County of San Francisco's LORS.

Operation Impacts and Mitigation

Soil

During operation of the SFERP, the entire site would be covered with impervious material or landscaped so that no soil is exposed. The construction laydown area would be returned to the Port of San Francisco. Soil impacts and the potential for soil erosion will be insignificant.

Surface water

Storm Water

The SFERP site is generally flat, unpaved and covered with vegetation. The site slopes gently toward the San Francisco Bay. Surface water flows typically percolate into the ground or sheet flows off the site the San Francisco Bay (PWA 2005d). Construction of the facility would redirect all non-contact surface flows to a vegetated swale that discharges to the Bay.

The 4.0-acre project site would be covered by 100-percent impervious surfaces. The quantity of post-condition runoff from the site would exceed pre-condition runoff. The increased runoff would not be reduced to pre-existing conditions and no efforts will be made to improve water quality. Prior to the publication of the FSA, staff requests that the applicant provide evidence from the Port of San Francisco and the SFBRWQCB that no peak attenuation of stormwater from the site will be required and that the proposed vegetated swales can convey the 100-year peak runoff from the SFERP site.

Impacts of the recently proposed drainage plan with vegetated swales need to be examined in more detail prior to the FSA. Computations provided in Supplement A Data Response, Set 3A use the Rational Formula to calculate post-development conditions for the site. The Rational Formula uses a runoff coefficient, rainfall intensity, and the contributing area to calculate runoff in cubic feet per second. Calculations assumed a runoff coefficient for the site of 0.95 for areas that will be 100 percent impervious after construction (SFERP 2005n). Staff recommends increasing the value to 0.99 to account for no expected infiltration and no basin storage (ponding). The calculations should also use rainfall intensities for the 100-year, 1-hour storm to size vegetated swales and other best management practices.

During operation of the SFERP, discharges of stormwater runoff to the SF Bay would be subject to the permit requirements of the project owner's General NPDES Permit for Discharges of Storm Water Associated with Industrial Activity (condition of certification **SOIL & WATER- 9**). The permit requirements would include preparation of a SWPPP for industrial activities, including monitoring and testing requirements to ensure that there are no significant impacts or conveyance of pollutants to the Bay. There are no other surface-drainages on or near the site that will be impacted by the project.

Plant Drainage

Miscellaneous plant drainage would consist of process water drainage, equipment leakage, and drainage from facility containment areas. Water from those areas would

be collected in a system of floor drains, sumps, and pipes within the SFERP and discharged to the Future MUNI Facility storm drainage collection system which ultimately drains to the San Francisco Combined Sewer System. Oil and water separators have not been proposed for discharged water from the facility containment areas. Runoff from the plant shall meet the limitations for industrial discharges as stated in the San Francisco Public Works Code, Article 4.1. No significant water impacts are expected due to runoff from the plant drainage if the project owner meets condition of certification **SOIL & WATER-8**.

Hazardous materials would be stored within secondary containment to prevent any potential for dispersion of any chemical spills by stormwater (SFERP2004r). Condition of certification **SOIL & WATER-9** requires the project owner to prepare a SWPPP for Industrial Activity, to include monitoring and testing requirements, and ensure there are no significant impacts or conveyance of pollutants to the City's combined sewer system or the San Francisco Bay.

Flooding, and Tsunami

The applicant does not believe the project site is within a flood or tsunami zone. The project site would be established at an elevation of approximately 13 feet above mean sea level and more than 500 feet from the shoreline. The applicant has stated that the highest tide recorded near the project area is less than 9.5 feet above mean sea level (SFPUC 2005a). The highest tide recorded does not take into account wave runup. The 100-year tide elevation, including the effect of wind-generated wave runup at MHHW (MHHW = mean higher high water, or the average level of the higher of the two daily high tides) is 13 feet above mean sea level (Mirant 2000). Under these Bay conditions the SFERP site is effectively at the flood elevation. The site will sustain some flood protection from the 500 feet distance from the shore to the plant.

A map of the 100-year flood plain is not available from the City of San Francisco or the Federal Emergency Management Agency (FEMA) (PWA 2005c). Information in the AFC regarding potential flooding was developed based on studies performed for a previous application, at the previous project site, and cited in the Potrero Power Plant, Unit 7 AFC. The information from the Potrero Power Plant, Unit 7 site is applicable and appropriate for use at the SFERP site. A review of the FEMA records indicates that San Francisco is not listed as a Special Flood Hazard Area. Additionally, the City and County of San Francisco are not part of FEMA's National Flood Insurance Program. The San Francisco Community Safety Element indicates that there are no areas prone to surface flooding in San Francisco (SFERP 2004a).

The restriction to San Francisco Bay formed at its entrance near the Golden Gate Bridge as well as the size of the bay, serves to dampen and minimize effects from tsunami that could occur from incoming ocean waves. Based on this, the potential for flooding from adverse Bay conditions at the project site is low. If the 100-year tsunami event occurred at the same time as the 100-year tide, the total run-up would be 18.5 feet, which would present a problem at the proposed project site (SFERP 2004g). However, staff does not propose any conditions of certification because this is an unlikely and unusual event that would be beyond the reasonable planning contingencies that any industrial facility would need to prepare for in the area.

Groundwater

Depth to groundwater was described at approximately 6.3 to 7.6 feet below ground surface (SFERP 2005p). The project will not use ground water. Therefore groundwater would not be withdrawn by the project. The project would require minimal grading. The project building foundations may slightly impact shallow groundwater flow. The shallow groundwater may have to flow around or beneath the building foundations to flow to the bay. The project will not substantially alter groundwater flow or groundwater recharge.

Water Quality

Activities at SFERP would have minimal potential to impact groundwater resources in the project area. The entire SFERP site would be covered with impervious surfaces after construction. Stormwater runoff from the hazardous materials containment portions of the plant site will be collected in storm drains and discharged to the City's combined sewer system. No underground chemical storage tanks are proposed at the project site. No releases of contaminated stormwater from the plant site are expected.

Spill Prevention

Solid wastes and small amounts of hazardous waste that are generated would be properly accounted for, tracked, handled, and disposed of off-site using licensed transporters and disposal facilities. No significant impacts to groundwater resources are expected from the operation of the SFERP project.

Water Supply

SFERP will use both potable and non-potable water resources for plant operations. The primary process water for the SFERP would be disinfected tertiary recycled water provided by the treatment of a portion of the City's raw sewage at the SFERP's on-site wastewater treatment plant. The City's Combined Sewer System would provide sufficient capacity for the process water according to a Will-Serve letter from the City of San Francisco Public Utilities Commission, Water Pollution Control Plant that states up to 500 gallons per minute can safely be withdrawn (SFERP2004q). Use of reclaimed water satisfies State and Local Policies related to conserving potable water supplies.

Water use at SFERP is anticipated to average 349 gallons per minute (gpm) with a maximum of 408 gpm required from the combined sewer system (Figure 8.14-2, SFERP 2005a) for process water and equipment wash water. Of that drawn from the combined sewer system, an average of 185 gpm and a maximum of 229 gpm will be discharged to the atmosphere for evaporative cooling and an average of 164 gpm and a maximum of 179 gpm will be discharged to the combined sewer system (Figure 8.14-2, SFERP 2005a). In addition SFERP is anticipated to use an average of 1 gpm and a maximum of 2 gpm of potable water for domestic uses (Figure 8.14-2, SFERP 2005a).

On an annual basis the applicant indicates that SFERP will use an average of 132 acre-feet and a maximum of 163 acre-feet of recycled water based on 12,000 hours of turbine operation (figure 8.14-2 and table 8.14-6, SFERP 2005a).

Alternative Water Sources

The applicant discussed alternative water sources in the context of compliance with Policy 75-58 (SFERP 2005a). The applicant considered the following alternative water sources:

- Wastewater being discharged to the ocean. Treated wastewater from the Oceanside Water Treatment Plant, which discharges to the ocean, was dismissed as a not practical alternative water source because the plant is seven miles away from the SFERP site. Wastewater being discharged from the SEWPCP at Pier 80 was dismissed as an alternative water source due to the high salinity levels. The high saline content results from infiltration into the sanitary sewers near the bay. The proposed SFERP source water will be collected from sewers at higher elevations that are not subject to bay water infiltration (SFERP Data Response 6a).
- Ocean. Ocean water was also dismissed as a not practical alternative water source because the Pacific Ocean is seven miles away from the SFERP site.
- Brackish water from natural sources or irrigation return flow. Bay water was dismissed as a potential alternative water source because of potential thermal impacts of discharges of process water to the San Francisco Bay and the complication of construction of shoreline infrastructure. In addition, use of Bay water would require an individual NPDES permit and approval from the Bay Conservation and Development Commission (BCDC). The preferred alternative of using recycled wastewater was determined to have fewer potential impacts and fewer permitting requirements.
- Other inland waters. No other inland water sources, including groundwater, were available in sufficient quantities to provide a reliable water supply for the SFERP.

Potable Water

SFERP would use potable water delivered to San Francisco from the Hetch Hetchy Water Supply System. One domestic use tap would connect into the existing SFPUC waterline in 25th Street. The SFERP anticipates 1,440 gallons per day for potable plant service water (SFPUC 2005a). Potable water would be used to perform the hydrostatic testing for each pipeline. SFERP estimates that 30,000 gallons would be used to pressure test the facilities (SFPUC 2005n).

Staff is concerned that failure of power at the water pump station, or another component of the recycled water plant, could curtail on-site wastewater treatment and the SFERP supply of process water (Data Response 108, SFERP2004r). The applicant believes that extended curtailment of recycled water production, from a power failure at the WPS or any other reason, is highly unlikely. As such, the applicant believes that the frequency and duration of using potable water for the process water supply cannot be predicted (Data Response 112, SFERP2004r).

Scheduled disruptions in the Title-22 recycled water delivery or production processes are not anticipated but unscheduled disruptions could occur. The recycled water treatment process may be disrupted by power failure, unusually high debris or grit loads, toxic material, or catastrophic events. These unplanned/unscheduled situations are unlikely but may require the use of emergency backup water supply provided from

the City's potable service 8" main in 23rd Street (SFERP 2004u) while recycled water production is disrupted. The potable water is subject to availability from the distribution facilities. The project owner shall use the capacity of the storage facilities to draw water from the City's potable supply only during hours of low demand. The July 7, 2005 will-serve letter from SFPUC does not state the capacity of the local water main to meet peak emergency, potable-backup-water use, nor does the letter state limits to potable water resources.

Given existing potable supply limitations, the reasonableness of using potable water as a back-up supply was evaluated. The use of emergency backup water by the power plant results in competing resources as power is supplied to the City at the same time the City's potable water resources are being exploited. Reasonable costs for emergency backup water supply were evaluated based on the demand for reliable power, total project water requirements, and the evaluation of emergency backup compared to alternatives.

- Energy conservation efforts will help to reduce the demand for power generation and conserve the amount of potable water being used as backup, during planned and unplanned recycled water supply outages. The project owner, working with the SFPUC shall employ any reasonable conservation methods to reduce the energy demand when the supply of recycled water will be interrupted for more than one week.
- The average annual recycled water use is estimated at 132 acre-feet annually. Over a three-year period the average water use would be roughly 400 acre-feet. Condition of certification **SOIL & WATER-11** requires that the SFERP monitor the use of potable water throughout a three year term and limit their potable backup use to 50 acre-feet. This volume will extend the average daily operation time by 47 days based on the average daily use (Table 8.14-6 SFPUC 2005a). This recommendation establishes approximately 90% reliability criteria for the power plant's wastewater treatment facility to function properly over any three-year period. This recommendation is an adaptive limit that should be reevaluated annually for potential alternative water sources that would reduce this limit over the life of the SFERP.
- Several alternative water sources have been identified in the AFC, Supplement A, and in response to staff data requests (SFERP 2004a, SFPUC 2005a, SFERP 2005u). However, the applicant has identified all other local water sources as impractical. For example, the effluent from the SEWPCP was determined to be high in salinity which is costly to treat to the level of quality required by the cooling process. Alternative water sources may become available in future years and this could reduce the power plant's reliance on potable water but they are not currently available.

n the exceptional case of a severe drought, the reliability of potable water sources can ɔe affected by the power plant's consumption. The City's energy needs should be ɔompared against a high cost of using potable water as a backup solution.

n abiding by the condition of certification **SOIL & WATER-11**, the applicant is in ɔompliance with LORS and has reduced any potential impact to fresh water to less than

significant levels. The annual volume of potable water used by SFERP for plant operations shall not exceed 50 acre-feet over any three-year period. The project owner will notify the CPM in writing if potable water is used for cooling purposes and provide an explanation of why backup supplies are being used. Staff is open to discussing the potable water limits with the applicant during upcoming workshops so we can balance business needs with the state guidance that water not be used "unreasonably".

Non-Potable Water Source

Non-potable tertiary treated recycled water would be processed on site. The recycled water would be used for cooling tower makeup, other process water, and equipment wash water. Dual plumbing would be used to substitute for potable water for toilet flushing. **SOIL & WATER-4** requires the project owner to file and request review by the San Francisco Department of Public Works its plans for installing dual plumbing at the SFERP utilizing disinfected tertiary recycled water for plant service needs not requiring potable water. The Dual Plumbing plan is to be prepared in accordance with San Francisco's Public Works Code Article 22, and may be consolidated if practical with the Engineer's Report for the Production, Distribution and Use of Recycled Water at the SFERP as required under **SOIL & WATER-5**. The project owner shall identify the site supervisor by name and provide their qualifications to the CPM. Also refer to **SOIL & WATER-10** for additional information on non-potable use requirements.

The City's Auxiliary Water Supply System (AWSS), a non-potable, high-pressurized source may be tapped at the fire hydrants off Third Street for use for fire flows only. In the event that water from the AWSS is needed, the San Francisco Fire Department will run hoses overland and use a pumper truck to deliver water to the facility.

Recycled Water

Raw sewage will be supplied from the City's combined sewer system at a collection station near Marin Street. The raw sewage will receive partial preliminary treatment before being piped to SFERP. The SFERP will process the reclaimed water to tertiary treated recycled water that has undergone screening, grit removal, extended aeration, secondary clarification, filtration, chlorination, and dechlorination. The recycled water must meet the California Code of Regulations, Title 22, Division 4 requirements for "unrestricted use." All recycled water pipelines, storage tanks, and ancillary facilities will be constructed in compliance with Titles 17 and 22. Title 17 addresses the requirements for backflow prevention and cross connections, while Title 22 addresses public health and use restrictions.

The disinfected tertiary recycled water produced from raw sewage could pose a public health hazard if not treated to adequate standards for water quality during plant operations or if wastewater treatment wastes are not properly handled. The proposed SFERP wastewater treatment plant for producing disinfected tertiary recycled water will be designed and operated according to Title 22 standards. Condition of certification **SOIL & WATER-5** requires the project owner to prepare an Engineer's Report for the production, distribution, and use of recycled water at SFERP, and to obtain review and

comment from the State Department of Health Services and SFBRWQCB which typically approve wastewater recycling plants (DHS 2004a). The Engineer's Report will demonstrate the adequacy of the proposed wastewater treatment processes and the compatibility of water quality with the proposed uses.

The applicant should consider an option to route all surface runoff through the onsite water treatment plant operations. Recycling stormwater will reduce the stormwater flows into the combined sewer system and contribute less to potential overflows into the Bay during wet weather. A plan for zero liquid discharge for stormwater could also reduce the amount of effluent being pumped to the site, in effect, saving the energy required to pump to the SFERP site.

Water Metering Devices

The Energy Commission manages a data collection system which contains the information necessary to develop a series of legislatively-mandated policy reports and analysis. Commission policy reports include the Integrated Energy Policy Report (IEPR) prepared every two years for the Governor's approval. The IEPR was last released in 2003 (IEPR 2003). Because water use is an important aspect of the energy facility footprint, the Energy Commission has been requiring the submittal of monthly and annual water use to the data collection system through conditions of certification since 2002. This project is required to submit the data in condition of certification **SOIL & WATER-10**.

In order to complete this task, the SFERP project owner shall install and maintain metering devices as part of the water supply and distribution system to monitor and record in gallons per day,

1. total volumes of potable and recycled water supplied to the SFERP, and
2. volumes used for potable water, cooling purposes, non-cooling processes, irrigation, wash water, demineralized water and turbine injection.

The metering devices shall be operational for the life of the project. An annual summary of daily water use by the SFERP, differentiating between potable and recycled water, shall be submitted to the CPM in the annual compliance report. This condition of certification is required as part of **SOIL & WATER-10**.

Wastewater Discharge

The SFERP would generate plant wastewater from discharges from cooling tower and process blowdown, backwash water from ultra filters, sanitary wastewater, and reject water from reverse osmosis unit. Disposal of this wastewater would be through a discharge from the plant wastewater sump to the City combined sewer system. The average discharge is expected to be 164 gallons per minute. The annual average is expected to be 39.4 million gallons per year based on 4,000 hours of maximum annual output. The peak discharge rate is estimated to be as much as 610,000 gallons per minute. A new 30-inch wastewater discharge pipe will be constructed by way of Maryland Street to the combined sewer stub-out on Cesar Chavez Street (SFERP Data Response 6a, SFERP 2005w). Effluent to the City's combined sewer system is stored before being processed at the Southeast Water Pollution Control Plant (SEWPCP).

Wastewater discharges to the City combined sewer system from the power plant must comply with the limits set forth in Section 123(a) of Article 4.1, Chapter X, Part II of the San Francisco Public Works Code. Each waste stream would be checked as part of the routine maintenance procedures to ensure that the discharge to the existing sewer meets appropriate City of San Francisco discharge limits. Any grab sample of the discharger's wastewater shall not at any time exceed any numerical limitations provided in **Soil & Water Table 2** which staff determined were adequate to protect water quality. Any composite sample of total recoverable oil and grease representative of the total discharge of the wastewater generated over a production week shall not exceed the numerical limitation for total recoverable oil and grease provided in **Soil & Water Table 2**. Limitations for industrial discharges to the San Francisco Combined Sewer System shall also meet the City and County of San Francisco, Department of Public Works Order No. 151870. Limits, shown in **Soil & Water Table 2**, are based on a composite sample taken on a representative 24-hour period.

Reject streams from wastewater treatment would consist of solids removed from the traveling screens, sludge pumped from the aeration tanks and additional solids rejected from the membrane process. In addition, the reject streams would consist of liquids that are concentrated constituents of the recycled water, and residues of the chemicals added to the raw water such as to coagulate suspended solids prior to filtration, control pH and eliminate free chlorine (SFERP 2004a).

Estimated wastewater quality data, which combines the overall waste streams summarized above indicate the SFERP should be able to meet the discharge standards imposed on the San Francisco combined sewer system by Article 4.1. This is evident in reviewing **Soil & Water Table 2** - Comparison of SFERP's Wastewater Discharge Quality vs. City Discharge Limits. Staff has reviewed a copy of the Will-Serve letter from the City of San Francisco Public Utilities Commission, Bureau of Environmental Regulation and Management stating the estimated wastewater quality characteristics would comply with the City's discharge limits. Condition of certification **SOIL & WATER-8** requires the project owner to remain within the limits specified in a Class I Industrial Discharge Permit for SFERP operations as required by San Francisco Public Works Code, Article 4.1.

No significant impacts are expected from wastewater discharge after adoption and implementation of staff's conditions of certification.

Sanitary Wastewater

Sanitary wastewater generated from sinks, toilets and other sanitary facilities at the SFERP will discharge to the City's combined sewer system. The predicted average daily sanitary wastewater discharge flow is one gpm. The effluent load is within the treatment, conveyance, and disposal capacities of the City's system. No significant water impacts are expected due to sanitary wastewater from the plant if the project owner meets condition of certification **SOIL & WATER-8** for operational wastewater discharges to the City's combined sewer system.

Industrial Wastewater

Circulating (or cooling) water system blowdown would consist of recycled water that has been concentrated by approximately five cycles of concentration and will contain the residue of the chemicals added to the circulating water. Cooling water treatment will require the addition of a pH control agent, a mineral scale dispersant, corrosion inhibitors, and biocides. These chemicals control scaling and biological growth in cooling towers and corrosion of the circulating water piping and condenser tubes. The waste stream would be returned to the City's combined sewer system. No impacts to surface or groundwater resources are anticipated as a result of industrial wastewater discharged to the combined sewer system providing the project owner meets condition of certification **SOIL & WATER-8.**

Miscellaneous plant drainage would consist of area washdown, equipment leakage, and drainage from facility equipment areas. Water from these areas would be collected and discharged to the combined sewer system. An average flow of one gpm from the domestic plant wastewater system is projected.

CUMULATIVE IMPACTS AND MITIGATION

Soils

Construction activities related to the SFERP project may cause a temporary increase in cumulative wind and water erosion. During construction of the facility the disturbed area would be subject to wind and water erosion until surface cover comprised of pavement is in place. SFERP linear facilities would be installed in existing roadways and utility right-of-ways to the maximum extent possible and could contribute to a significant cumulative impact if existing utilities are impacted and service disrupted. The applicant has provided a Draft SWPPP for construction activity as required in a NPDES permit for construction activity. The SWPPP would include linear facility construction. Implementation of the ESCP and SWPPP for Construction and Industrial Activities will avoid significant adverse impacts resulting from erosion of soils.

The project site is not located on agricultural land and would not result in the conversion of agricultural land to non-agricultural uses. The project would not combine with other closely related projects to cause a loss of agricultural land.

Although it is likely that contaminated soils would be encountered during construction, implementation of the SMIP would prevent significant cumulative impacts.

Surface Hydrology

Project related construction activities could increase soil erosion caused by rainfall runoff. Disturbed soils and dewatering activities could increase the sediment and pollution load downstream. BMPs will be employed in accordance with the DESCP to minimize erosion during and after construction. The stormwater and water from dewatering activities will be monitored and disposed of properly. It is anticipated that stormwater and water from dewatering activities will be discharged to the existing sewer system for treatment at the SEWPCP. SFRWQCB Order No. R2-2002-0073 regulates the quality of the SEWPCP discharges that drain to the San Francisco Bay

(SFERP 2004i). If the water is not acceptable to the SEWPCP it will be hauled to an appropriate treatment facility. For these reasons and with the implementation of best management practices, no significant cumulative impacts are expected.

The SFERP development would redirect surface drainage patterns that historically drain toward the San Francisco Bay. Surface runoff would be collected in a vegetated swale and routed to the Bay. The project would not involve construction in or disturbance of any surface waters or wetlands.

The implementation of a SWPPP, application of best management practices and LORS compliance will mitigate potential cumulative surface hydrology impacts to less than significant levels.

Water Supply

Staff has not identified any cumulative development projects that would diminish the supply of raw sewage in the combined sewer line supply. The proposed use of reclaimed water would be consistent with California Water Code requirements and State and Local Policies, including SWRCB Resolution 75-58, encouraging conservation of potable water supplies.

Groundwater

The project will not use ground water. Ground water may be encountered during construction and require dewatering. The water encountered would be shallow ground water and could be contaminated. Groundwater requiring dewatering during construction will be managed according to the SMIP. If non-hazardous and non-contaminated, the dewatering water would be discharged to the sewer system for treatment at the SEWPCP. If contaminated but non-hazardous, the dewatering water may be treated onsite before discharge to the SEWPCP. If hazardous, the dewatering water shall be hauled to an appropriate treatment or disposal facility. Ground water is not used for potable purposes in the area. The ground water is believed to flow from the inland area toward the Bay.

The entire SFERP site would be covered with impervious material after construction. Chemical storage areas would have secondary containment. All surface flow from the project area would be discharged to the combined sewer system for treatment at the SEWPCP. This will prevent the project from adding to the ground water contamination.

The project would not combine with other closely related projects to cause an increase to ground water contamination.

Wastewater

The wastewater streams from the SFERP site include cooling tower and process blowdown, sanitary wastewater, plant drainage and reject streams from wastewater treatment. The combined wastewater will be monitored to assure that it complies with the City's discharge limits in accordance with the Class I Industrial Discharge Permit.

COMPLIANCE WITH LORS

The project will comply with:

- The Clean Water Act by gaining coverage under the general NPDES permit and preparation of the ESCP and SWPPP;
- The Resource Conservation Recovery Act of 1976 by the proper handling and discharge of wastewater;
- 40 Code of Federal Regulations Part 423 for wastewater effluent, by monitoring that the constituent limitations are met even though they are more strict than the San Francisco Public Works Code, Article 4.1;
- The California Constitution, Article X, Section 2 by using reclaimed water for plant process water;
- The Porter-Cologne Water Quality Control Act by the use of reclaimed water and the implementation of the DESCP and SWPPP, as well as the adherence to the discharge requirements of San Francisco Public Works Code, Article 4.1;
- California Water Code 13550 by using reclaimed water for all non-potable plant uses;
- The California Safe Drinking Water and Toxic Enforcement Act by establishing secondary containment in chemical storage areas, and including dual plumbing for use of recycled water;
- The Water Recycling Act by using reclaimed water for plant process water;
- Title 17 of the California Code of Regulations, by ensuring the Department of Health Services confirms the requirements for backflow prevention and cross connections of potable and non-potable water lines;
- Title 22 of the California Code of Regulations, by ensuring the Department of Health Services reviews the wastewater treatment systems to ensure they meet tertiary treatment standards for protection of public health;
- Title 23 of the California Code of Regulations requiring the Regional Board to issue Waste Discharge Requirements specifying conditions for protection of water quality as applicable. And to ensure the wastewater treatment plant operator or site supervisor is qualified for the effective operation of wastewater and water recycling treatment plants;
- The SWRCB Resolution 75-58 by using reclaimed water for plant process water;
- The SWRCB Resolution 77-1 by using reclaimed water for plant process water;
- The SWRCB Resolution 68-16 by avoiding discharge of wastewater to high quality waters;
- The Integrated Energy Policy Report (CEC 2003) by using reclaimed water for plant process water;
- San Francisco Public Health Code (Article 22A) by adherence to the testing and reporting requirements;

- San Francisco Building Code by adherence to the grading and erosion control standards;
- San Francisco Public Works Code, Article 4.1 by adherence to the City's waste discharge requirements;
- San Francisco Public Works Order No. 158170 by adherence to the City's wastewater discharge requirements;
- San Francisco Public Works Code, Article 22 by installation of dual plumbing for attaining maximum use of recycled water;

NOTEWORTHY PUBLIC BENEFITS

The use of raw sewage will slightly decrease the volume of wastewater treated by the SEWPCP and reduce the quantity of secondary wastewater discharged to San Francisco Bay. The use of recycled water for plant processes reduces the need for other freshwater sources to be used for this project and maintains reliability of local water supplies.

Chapter 7.5 of the California Water Code, the Water Recycling Act of 1991, sets a statewide water recycling goal to recycle a total of one million acre-feet of water per year by the year 2010. The SFERP site will use on average 132 acre-feet of the total recycled water produced each year at SFERP in support of the 2010 goal.

RESPONSE TO AGENCY AND PUBLIC COMMENTS

Comment: Department of Toxic Substances Control-4 The Department of Toxic Substances Control sent a letter dated June 18, 2004 to Bill Pfanner at the CEC, requesting a paragraph specific to groundwater at the project area be added to the AFC (DOTSC2002a).

Response: The third (final) paragraph of section 8.14.4.4 of the AFC is specific to the project area. Additional information was requested and received during Data Adequacy. This information is located on pages 30 and 31 of the Data Adequacy Supplement referenced as SFERP2004g. Staff has also included a summary and analysis of the potential groundwater contamination in this PSA.

Comment: Department of Toxic Substances Control-5 The Department of Toxic Substances Control sent a letter dated June 18, 2004 to Bill Pfanner at the CEC, requesting an evaluation of impacts from dewatering activities related to groundwater contamination and disposal. DTSC also recommended that the evaluation be contained in the Site Mitigation and Implementation Plan that would be sent to the RWQCB for approval. DTSC also recommends that a qualified professional should evaluate the potential health and safety issues related to groundwater contamination and the evaluation be included in the Site Health and Safety Plan (DOTSC2002a).

Response: The Impacts from dewatering are being evaluated. Staff has reviewed the draft SWPPP, the requirements of San Francisco Public Health Code Article 22A, and San Francisco Public Works Code Article 4.1. These documents require the applicant to

mitigate for, test and monitor soil and runoff from the site. Condition of certification **SOIL & WATER-2** requires the project owner to obtain coverage under the general NPDES permit administered by the SFBRWQCB which regulated point source and non-point source discharges to surface waters and the preparation of a SWPPP. Condition of certification **SOIL & WATER-3** requires the project owner comply with the requirements found in San Francisco Public Works Code, Article 4.1. Condition of certification **SOIL & WATER-6** requires the project owner to prepare a Site Mitigation and Implementation Plan (SMIP) and provide letters from the San Francisco Department of Public Health and SFBRWQCB stating that the SMIP for treating contaminated soil and water, should it be encountered, is adequate and meets requirements of San Francisco Public Health Code Article 22A. The SMIP will include assessing potential environmental and health and safety risks, recommending measures to mitigate the risks, identifying appropriate waste disposal and handling requirements, and presenting criteria for on-site reuse of soil. In accordance with condition of certification **SOIL & WATER-7** and after completion of ground disturbance, Article 22A also requires San Francisco Department of Public Health approval of a Certification Report for the SMIP verifying that all mitigation measures have been completed satisfactorily. Staff has required that the Certification Report be reviewed by the SFBRWQCB.

CONCLUSIONS

With the information provided to date, staff has not identified any unmitigated significant impacts to Soil and Water Resources. The SFERP would comply with all applicable soil and water resources LORS, and potentially significant impacts would be mitigated through the preparation and implementation of various construction and operating plans that could have otherwise caused soil erosion, contamination to surface and ground water, or non-compliance with wastewater treatment and discharge requirements.

In order to complete the FSA, staff requires the following items be submitted:

- Results from the soil and groundwater sampling compliant with the requirement for soil sampling and analysis of Article 22A of the San Francisco Public Health Code.
- Evidence from the Port of San Francisco and the SFBRWQCB that no peak attenuation of post-construction stormwater flow from the site will be required.
- Evidence from the Port of San Francisco stating that the SFERP will be covered under the Port's NPDES permit.
- Evidence that the proposed vegetated swales can convey the post-construction 100-year peak runoff from the SFERP site. A map showing the location, alignment and dimensions of the vegetated swale. Provide engineering details for the stabilization methods to be used to protect the vegetated swale at the point of outfall to the SF Bay.

PROPOSED CONDITIONS OF CERTIFICATION

SOIL & WATER-1 Prior to site mobilization, the project owner shall obtain CPM approval for a site-specific Drainage, Erosion and Sedimentation Control Plan (DESCP) that ensures protection of water quality and soil resources of the project site and all linear facilities for both the construction and operational phases of the project. This plan shall address appropriate methods and actions, both temporary and permanent, for the protection of water quality and soil resources, demonstrate no increase in off-site flooding potential, meet local requirements, and identify all monitoring and maintenance activities. The plan shall be consistent with the grading and drainage plan as required by condition of certification **CIVIL-1** and may incorporate by reference any Stormwater Pollution Prevention Plan (SWPPP) developed in conjunction with any NPDES permit. The DESCP shall contain the following elements:

- Vicinity Map – A map shall be provided indicating the location of all project elements with depictions of all significant geographic features including swales, storm drains, and sensitive areas.
- Site Delineation – The San Francisco Electric Reliability Project (SFERP) site, lay down area, all linear facilities, and project elements shall be delineated showing boundary lines of all construction areas and the location of all existing and proposed structures, pipelines, roads, and drainage facilities.
- Watercourses and Critical Areas – The DESCP shall show the location of all nearby watercourses including swales, storm drains, and drainage ditches. Indicate the proximity of those features to the SFERP construction site, lay down area, and all pipeline and transmission line construction corridors.
- Drainage – The DESCP shall provide a topographic site map showing all existing, interim and proposed drainage systems; drainage area boundaries and water shed sizes in acres; the hydraulic analysis to support the selection of Best Management Practices (BMPs) to divert off-site drainage around or through the site and laydown areas. On the map, spot elevations are required where relatively flat conditions exist. The spot elevations and contours shall be extended off-site for a minimum distance of 100 feet in flat terrain.
- Clearing and Grading – The plan shall provide a delineation of all areas to be cleared of vegetation and areas to be preserved. The plan shall provide elevations, slopes, locations, and extents of all proposed grading as shown by contours, cross sections or other means. The locations of any disposal areas, fills, or other special features will also be shown. Illustrate existing and

proposed topography tying in proposed contours with existing topography. The DESCP shall include a statement of the quantities of material excavated or filled for each element of the SFERP (project site, lay down area, transmission corridors, and pipeline corridors), whether such excavations or fill is temporary or permanent, and the amount of such material to be imported or exported.

- Project Schedule – The DESCP shall identify on the topographic site map the location of the site specific BMPs to be employed during each phase of construction (initial grading, project element excavation and construction, and final grading/stabilization). Separate BMP implementation schedules shall be provided for each project element for each phase of construction.
- Best Management Practices – The DESCP shall show the location, timing, and maintenance schedule of all erosion and sediment control BMPs to be used prior to initial grading, during project element excavation and construction, final grading/stabilization, and following construction. BMPs shall include measures designed to control dust and stabilize construction access roads and entrances. BMPs shall include measures designed to prevent wind and water erosion in areas with existing soil contamination. The maintenance schedule should include post-construction maintenance of treatment control BMPs applied to disturbed areas following construction.
- Erosion Control Drawings -- The erosion control drawings and narrative must be designed and sealed by a professional engineer/erosion control specialist.

No later than 90 days prior to start of site mobilization, the project owner shall submit a copy of the plan to the City and County of San Francisco Public Works Department and San Francisco Public Utilities Commission for review and comment. No later than 60 days prior to start of site mobilization, the project owner shall submit the plan and City and County of San Francisco Public Works Department and San Francisco Public Utilities Commission comments to the CPM for review and approval. The CPM shall consider comments received from the City and County of San Francisco Public Works Department and San Francisco Public Utilities Commission. During construction, the project owner shall provide an analysis in the monthly compliance report on the effectiveness of the drainage, erosion and sediment control measures and the results of monitoring and maintenance activities. Once operational, the project owner shall provide in the annual compliance report information on the results of monitoring and maintenance activities.

SOIL & WATER-2 The project owner shall comply with the requirements of the General National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Storm Water Associated with Construction Activity. The project owner shall develop and implement a Storm Water Pollution Prevention Plan (SWPPP) for the construction of

the entire SFERP site, Lay Down Area, and all linear facilities (construction SWPPP).

The project owner shall submit copies to the CPM of all correspondence between the project owner and the RWQCB about the General NPDES permit for the Discharge of Storm Water Associated with Construction Activities within 10 days of its receipt (when the project owner receives correspondence from the RWQCB) or within 10 days of its mailing (when the project owner sends correspondence to the RWQCB). This information shall include copies of the Notice of Intent and Notice of Termination for the project.

SOIL & WATER-3 The project owner shall comply with the discharge limitations, pretreatment requirements, peak flow restrictions, dewatering discharges, payment of fees, and monitoring and reporting requirements as found in the San Francisco Public Works Code, Article 4.1 during discharge of potentially hazardous wastewater from de-watering of construction sites and discharge of water used for cleaning/hydrostatic testing of pipes or tanks, or during any other activity that generates wastewater, other than from routine commercial and/or industrial processes.

At least 30 days prior to the start of site mobilization, evidence of how the project owner complies with San Francisco Public Works Code, Article 4.1 shall be submitted to the CPM. The project owner shall submit copies of all correspondence between the project owner and SFPUC Bureau of Environmental Regulation and Management within 10 days of its receipt (when the project owner receives correspondence from the SFPUC) or its mailing (when the project owner sends correspondence to the SFPUC). The CPM shall be notified in writing of any analyzed sample that does not comply with the regulatory limits within 10 days of receiving sample results.

SOIL & WATER-4 Prior to beginning any site mobilization activities, the project owner shall submit a Dual Plumbing Plan utilizing disinfected tertiary recycled water for plant service needs not requiring potable water to the San Francisco Department of Public Works for review and comment and to the CPM for review and approval. The Dual Plumbing Plan shall be prepared in accordance with San Francisco Public Works Code Article 22, and may be consolidated with the Engineer's Report for the Production, Distribution and Use of Recycled Water at the SFERP if practical, as specified in **SOIL & WATER-5**. The project owner shall comply with any reporting and inspection requirements set forth by the San Francisco Public Works Department to fulfill statutory requirements.

At least 30 days prior to the start of any site mobilization activities, the project owner shall submit the Dual Plumbing Plan to the San Francisco Department of Public Works and the CPM. At the time of submittal, the project owner shall request a letter from the San Francisco Department of Public Works with their comments on the Dual Plumbing Plan (or the Production, Distribution and Use of Recycled Water if used as the

substitute for the Plan). The project owner shall submit comments from the San Francisco Department of Public Works on the Dual Plumbing plan to the CPM for consideration in review and approval of the plan. The project owner shall revise the Dual Plumbing Plan per the CPM's instructions until it meets the requirements of San Francisco Public Works Code Article 22. The project owner shall submit copies of all correspondence between themselves and the San Francisco Department of Public Works to the CPM within 10 days of receipt or submittal.

SOIL & WATER-5 Prior to beginning any site mobilization activities, the project owner shall submit an Engineer's Report for the Production, Distribution and Use of Recycled Water at the SFERP to the State Department of Health Services and the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) for review and comment and to the CPM for review and approval. The Engineer's Report for the Production, Distribution and Use of Recycled Water at the SFERP shall be prepared in accordance with Titles 17 and 22 of the CA Code of Regulations, the Health and Safety Code, and the Water Code. The project owner shall comply with any reporting and inspection requirements set forth by the State Department of Health Services and SFRWQCB to fulfill statutory requirements.

At least 30 days prior to the start of any site mobilization activities, the project owner shall submit the Engineer's Report for the Production, Distribution and Use of Recycled Water at the SFERP to the State Department of Health Services, the SFBRWQCB, and the CPM. The project owner shall request letters from the State Department of Health Services and the SFBRWQCB with their comments on the Engineer's Report for the Production, Distribution and Use of Recycled Water at the SFERP. The project owner shall submit comments from the State Department of Health Services and the SFBRWQCB on the Engineer's Report to the CPM for consideration in the review and approval of the Engineer's Report. The project owner shall revise the Engineer's Report per the CPM's instructions. The project owner shall provide the CPM a copy of any correspondence between themselves and State Department of Health Services, or the SFRWQCB within 10 days of receipt or submittal.

SOIL & WATER-6 Prior to beginning site mobilization, the project owner shall submit a Site Mitigation and Implementation Plan (SMIP) for the treatment of contaminated soil and water, should it be encountered during project construction to the San Francisco Department of Public Health and San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) for review and comment and to the Energy Commission for review and approval. The SMIP shall be prepared in accordance with San Francisco Public Health Code Article 22A. The project owner shall comply with any reporting and inspection requirements set forth by the San Francisco Department of Public Health and SFRWQCB fulfill statutory requirements.

At least 30 days prior to the start of site mobilization, the project owner shall submit the SMIP to the San Francisco Department of Public Health and SFBRWQCB. The project owner shall request letters from the San Francisco Department of Public Health and the SFBRWQCB with their comments on the SMIP. The project owner shall submit

comments from the San Francisco Department of Public Health and the SFBRWQCB on the SMIP to the CPM for consideration in the review and approval of the SMIP. The project owner shall revise the SMIP per the CPM's instructions until it meets the requirements of San Francisco Public Health Code Article 22A. The project owner shall provide the CPM a copy of any correspondence between themselves and the San Francisco Department of Public Health or the SFRWQCB within 10 days of receipt or submittal.

SOIL & WATER-7 Prior to commercial operations, the project owner shall submit a Certification Report for the Site Mitigation and Implementation Plan (SMIP) for treating any contaminated soil and/or water encountered during project construction to the San Francisco Department of Public Health and San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) for review and comment and to the CPM for review and approval. The SMIP Certification Report shall be prepared in accordance with San Francisco Public Health Code Article 22A. The project owner shall comply with the Certification Report stating that all mitigation measures recommended in the SMIP have been completed and that completion of the mitigation measures has been verified through follow-up soil sampling and analysis, if required by the San Francisco Department of Public Health and SFRWQCB.

At least 30 days prior to the start of commercial operations, the project owner submit the SMIP Certification Report to the San Francisco Department of Public Health and SFBRWQCB. The project owner shall request letters from the San Francisco Department of Public Health and the SFBRWQCB with their comments on the SMIP Certification Report. The project owner shall submit comments from the San Francisco Department of Public Health and the SFBRWQCB on the SMIP Certification Report to the CPM for consideration in the review and approval of the SMIP Certification Report. The project owner shall revise the SMIP Certification Report per the CPM's instructions until it meets the requirements of San Francisco Public Health Code Article 22A. The project owner shall provide the CPM a copy of any correspondence between themselves and San Francisco Department of Public Health or the SFRWQCB within 10 days of receipt or submittal.

SOIL & WATER-8 The project owner shall comply with the discharge limitations, pretreatment requirements, peak flow restrictions, dewatering discharges, payment of fees, and monitoring and reporting requirements as found in the San Francisco Public Works Code, Article 4.1 and in accordance with the discharge requirements specified in San Francisco Department of Public Works Order No. 158170 during commissioning and commercial operation.

Verification: At least 30 days prior to the start of commissioning activities, evidence of how the project owner complies with the San Francisco Public Works Code, Article 4.1 shall be submitted to the CPM. The project owner shall submit copies of all correspondence between the project owner and SFPUC Bureau of Environmental Regulation and Management within 10 days of its receipt (when the project owner receives correspondence from the SFPUC) or its mailing (when the project owner sends

correspondence to the SFPUC). The CPM shall be notified in writing of any analyzed wastewater sample that does not comply with the regulatory limits of Article 4.1 within 10 days of receiving sample results. The annual compliance report shall provide evidence of how the project owner has complied with San Francisco Public Works Code, Article 4.1 and provide a summary of the wastewater sampling results.

SOIL & WATER-9 The project owner shall comply with the requirements of the General National Pollutant Discharge Elimination System (NPDES) Permit for Discharges of Storm Water Associated with Industrial Activity. The project owner shall develop and implement a Storm Water Pollution Prevention Plan for the operation of the SFERP (operational SWPPP).

Verification: The project owner shall submit copies to the CPM of the operational SWPPP for the entire SFERP site prior to commercial operation for review and approval, as well as all correspondence between the project owner and the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), the City and County of San Francisco Public Works Department, and the City Bureau of Environmental Regulation concerning the General NPDES permit for Discharge of Storm Water Associated with Industrial Activity within 10 days of its receipt (when the project owner receives correspondence from the SFBRWQCB) or within 10 days of its mailing (when the project owner sends correspondence to the SFBRWQCB). This information shall include a copy of the Notice of Intent and Notice of Termination.

SOIL & WATER-10 The project owner shall use disinfected tertiary recycled water supplied from the on-site treatment plant as its primary water supply source for cooling, process, and other approved non-potable uses. Prior to the use of any water by the San Francisco Electric Reliability Project (SFERP), the project owner shall install and maintain metering devices as part of the water supply and distribution system to monitor and record in gallons per day, 1) total volumes of potable and recycled water supplied to the SFERP, and 2) volumes used for potable water, cooling purposes, non-cooling processes, irrigation (if necessary), wash water, demineralized water and turbine injection. Those metering devices shall be operational for the life of the project. The project owner shall prepare an annual Water Use Summary, which will include the monthly range and monthly average of daily water usage in gallons per day, and total water used by the project on a monthly and annual basis in acre-feet. The annual summary shall distinguish sources and uses of water according to recycled water for cooling, process, landscape irrigation and other non-potable uses, fresh water used as a backup supply for cooling, process, irrigation supply and other non-potable uses, and fresh water used for domestic supply. For subsequent years, the annual Water Use Summary shall also include the yearly range and yearly average water use by the project. The annual summary shall be submitted to the CPM as part of the annual compliance report.

Verification: At least 60 days prior to use of any water source at the SFERP, the project owner shall submit to the CPM conclusive proof that metering devices have been installed and are operational on all the potable and recycled pipelines serving the project. The project owner shall provide a report on the servicing, testing and calibration of the metering devices in the annual compliance report.

The project owner shall submit a water use summary reports to the CPM in the annual compliance report for the life of the project. The summary reports shall be based on and shall distinguish between recorded daily use of potable and recycled water. Included in the summary reports of water use, the project owner shall submit copies of meter records from the City of San Francisco documenting the quantities of tertiary treated recycled water provided (in gallons per day) by the SEWPCP. The report shall include calculated monthly range, monthly average, and annual use by the project in both gallons per minute and acre-feet. After the first year and for subsequent years, this information shall also include the yearly range and yearly average recycled and potable water used by the project.

SOIL & WATER-11 The SFERP shall not use more than 50 acre-feet of potable water during any consecutive three-year period as an emergency backup to disruptions in the production or distribution of the recycled water from the treatment plant. The project owner will monitor the use of emergency backup water and report total usage to the CPM after any occurrence where potable water was used. The total emergency backup water usage will be reported to the CPM in the annual compliance report. During severe droughts, the project owner shall work with appropriate local agencies to reduce energy demand during planned and unplanned outages in order to reduce the need for potable water.

At least 30 days prior to any planned interruption the project owner will notify the CPM in writing of the potential use of potable backup water and with an estimate of the volume required to continue normal power generation. During any unplanned outages the project owner will notify the CPM as soon as it is realized that emergency backup water supply will be necessary. The project owner will document total usage for each planned and unplanned service interruption where potable water was used as an emergency backup. The project owner will report all disruptions to the recycled water treatment process, the associated volume of potable water used, and the total annual use for the year, and the two years prior, in the annual compliance report. The annual report shall report on the feasibility of alternative water supplies in lieu of potable water for emergency backup. The annual report shall discuss any energy conservation measures taken during planned outages.

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TRAFFIC AND TRANSPORTATION

James Adams

SUMMARY OF CONCLUSIONS

With implementation of the recommended conditions of certification, the project would be consistent with the Circulation Element of the City/County of San Francisco General Plan and all other applicable laws, ordinances, regulations, and standards. Additionally, the project would not have a significant impact on the local and regional road/highway network. During the construction phase, local roadway and highway demand resulting from the daily movement of workers and materials would not increase beyond significance thresholds established by City/County of San Francisco. During the operational phase, increased roadway demand resulting from the daily movement of workers and materials would be minimal.

INTRODUCTION

In the Traffic and Transportation section, staff addresses the extent to which the San Francisco Electric Reliability Project (SFERP) may impact the transportation system in the local area. This analysis includes the identification of: (1) the roads and routings that are proposed to be used for construction and operation; (2) potential traffic-related problems associated with the use of those routes; (3) the anticipated encroachment upon public rights-of-way during the construction of the proposed project and associated facilities; (4) the frequency of trips and probable routes associated with the delivery of hazardous materials; and (5) the possible effect of project operations on local airport flight traffic.

The influx of large numbers of construction workers can, over the course of the construction phase, increase roadway congestion and also affect traffic flow. In addition, the transportation of large pieces of equipment and facility components can impact roadway congestion and safety. The laws, ordinances, regulations, and standards (LORS) that govern the project are listed below, followed by discussion of the potential impacts related to traffic operations and safety hazards resulting from the construction and operation of the project.

TRAFFIC & TRANSPORTATION Table 1
Laws, Ordinances, Regulations, and Standards

Applicable Law	Description
Federal	
Title 49, Code of Federal Regulations (CFR), Sections 171-177; Sections 350-399 & Appendices A-G, Federal Motor Carrier Safety Regulations.	Governs the transportation and definition of hazardous materials, the types of materials defined as hazardous; criteria and regulations for the safe transportation of hazardous materials.
State	
California Street and Highways Code (S&HC), Sections 660, 670, 1450, 1460 et seq., 1470, and 1480.	Regulates right-of-way encroachment and granting of permits for encroachments on state and county roads.
S & HC Sections 13369, 15275,2500-2505 and 15278, 25160 ET SEQ; 31303-31309, 31600-31620; 32000-32053, 32100-32109;3400-3421;34500,34501, 34510-11 S & HC Sec. 117 & 660 &72, California Vehicle Code (CVC) Sec. 35780, ET SEQ; 35550-35559	Addresses licensing of drivers required for operation of particular types of vehicles, including those transporting hazardous, explosive, flammable, and/or combustible material; such as ammonia; safety requirements; hazardous material transport routes.
California State Planning Law, Government Code Section 65302 a&b	Requires permits for transport of oversized loads on county roads and state highways; requirements for encroachment permits on state highway; CALTRANS specific weight/load limitations for all state and local roadways. Requires cities and counties to adopt a general plan to guide its development, including a mandatory circulation element. All construction in public right-of-way needs to comply with the "Manual of Traffic Controls for Construction and Maintenance of Work Zones" (Caltrans, 1996).
California Street and Highways Code (S&HC), Sections 660, 670, 1450, 1460 et seq.,1470-1480	Regulates right-of-way encroachment and granting of permits for encroachments on state and county roads.
Sections 13369, 15275, and 15278	Addresses the licensing of drivers and classifications of licenses required for operation of particular types of vehicles. In addition, certificates permitting the operation of vehicles transporting hazardous materials are addressed.
Sections 25160 et seq.	Describes requirements for the safe transport of hazardous materials.
Sections 2500-2505	Authorizes the issuance of licenses by the Commissioner of the California Highway Patrol (CHP) to transport hazardous materials, including explosives.
California Vehicle Code (CVC) Sections 31303-31309	Regulates the highway transportation of hazardous materials, routes used, and restrictions. CVC Section 31303 requires hazardous materials to be transported on state or interstate highways that offer the shortest overall transit time possible.
Sections 31600-31620	Regulates the transportation of explosive materials.
Sections 32000-32053	Regulates the licensing of carriers of hazardous materials and include noticing requirements.

Sections 32100-32109	Establishes special requirements for the transportation of substances presenting inhalation hazards and poisonous gases. CVC Section 32105 requires shippers of inhalation or explosive materials to contact the CHP and apply for a Hazardous Material Transportation License. Upon receiving this license, the shipper will obtain a handbook specifying approved routes.
Sections 34000-34121	Establishes special requirements for transporting flammable and combustible liquids over public roads and highways.
Sections 34500, 34501, 34501.2, 34501.3, 34501.4, 34501.10, 34505.5-7, 34506, 34507.5, and 34510-11	Regulates the safe operation of vehicles, including those used to transport hazardous materials.
S&HC, Sections 117 and 660-72, and CVC, Sections 35780 et seq.,	Require permits to transport oversized loads on county roads. California S&HC Sections 117 and 660 to 711 require permits for any construction, maintenance, or repair involving encroachment on state highway rights-of-way. CVC Section 35780 requires approval for a permit to transport oversized or excessive loads over state highways.
California Department of Transportation (Caltrans)	Weight and load limitations for state highways apply to all state and local roadways. The weight and load limitations are specified in the CVC Sections 35550 to 35559.
Local	
City/County of San Francisco General Plan Transportation Element	The project, and construction and operation traffic routes connecting to highways, are located entirely within the boundaries of the City and County of San Francisco (CCSF). The CCSF Transportation Element of the General Plan is required by State law. The Transportation Element has several objectives and policies pertinent to the proposed power plant such as utilizing public transit whenever possible, designating expeditious routes for trucks to avoid conflicts with automobile traffic, encouraging flexible work schedules to reduce peak period congestion, and providing off-street facilities for freight loading and service vehicles on the site of new buildings sufficient to meet the demands generated by the intended uses.
Chapter 4, San Francisco Congestion Management Plan	The San Francisco County Transportation Authority is the designated Congestion Management Agency for San Francisco, and is responsible for developing and administering the CMP. If a project degrades intersections operating at a LOS of A, B, C, or D to E or F, or E to F, the CMP requires mitigation.

SETTING

The project site is located in San Francisco between Cesar Chavez (formerly called Army) and 25th Streets, just east of Third Street and approximately 0.38 miles east of State Route (SR) 280, and three miles south of downtown San Francisco. The facility would be located behind the proposed MUNI Metro East Light Rail Vehicle Maintenance and Operations Facility. To the east is the San Francisco Bay shoreline. **TRAFFIC and TRANSPORTATION Figure 1, Regional Transportation Facilities near the Project Site**, shows the region surrounding the project site.

Local transportation routes in the project area include freeways, highways, and local roadways. Plant construction and operation traffic will use the existing area roadways. The regional local roadways, bus and train routes, and bicycle lanes in the area that will be most affected by the project are shown in **TRAFFIC AND TRANSPORTATION Figure 2, Local Transportation Network near the Project Site.** Access to the site

would be from 25th Street. The critical roads and highways in the area of the project are identified below.

SR-280

SR-280 begins south of San Francisco's Market District and passes approximately five blocks west of the project site. SR-280 runs south to San Jose and is composed of six to eight lanes of mixed-flow traffic with a daily capacity of 288,000 vehicles in the vicinity of the project site. Caltrans placed SR-280 (mile post 6.05) daily average traffic volume at 92,000 vehicles with a peak hour volume of 7,050 vehicles in 2003.

US Highway 101

US 101 is a north-south freeway located approximately one mile west of the project. It is an eight lane limited access freeway with a capacity of 389,000 vehicles. The Caltrans 2003 traffic counts on US 101 (mile post 2.92) indicate an average daily traffic volume of 249,000 vehicles with a peak hour traffic volume of 15,650 vehicles.

Third Street

Third Street is a major north-south roadway two blocks west of the site. It is a commercial street that provides an access route for industry located along the waterfront area. Third Street is a six-lane arterial with three 10 foot-wide traffic lanes in both directions. The street has a center median, with openings for left turns at intersecting streets such as 22nd and 23rd Streets. Left turn lanes are provided at intersections with other major arterial roadways, but are not provided at minor intersections. On-street parking is normally allowed on both sides of the street. Third Street carries approximately 18,800 vehicles per day.

The San Francisco Municipal Railway (MUNI) is currently in the construction phase of its Third Street Light Rail project. The project will offer light rail service between Fourth and King Street to the Bayshore-CalTrain Station. The project will create a 32-foot center median on Third Street that contains two light rail tracks. Third Street will then be a four lane arterial with two 11-foot traffic lanes and eight foot shoulders in each direction. Left turn lanes will remain on Third Street for Evans Avenue, Cesar Chavez Street, 25th Street (northbound), 23rd Street and 20th Street.

The San Francisco General Plan designates Third Street as a Major Arterial and Primary Transit Route. The plan also designates Third Street as a Neighborhood Commercial Street and a citywide bicycle route.

Cesar Chavez Street

Cesar Chavez Street is a major arterial carrying approximately 15,500 vehicles per day. It is located five blocks south of the project running in an east-west direction, providing access to the project from both I-280 and US 101. It intersects Third Street. Vehicles can access the site by turning north on Third Street and proceeding to 25th Street. Cesar Chavez Street is also a citywide bicycle route.

Pennsylvania Avenue

Pennsylvania Avenue is a four-lane north-south arterial carrying approximately 6,700 vehicles per day. It provides access to Cesar Chavez Street and the surrounding industrial areas via a southbound I-280 exit ramp.

23rd Street

23rd Street is a two-lane collector road running in an east-west direction and carrying approximately 3,000 vehicles per day that provides access to surrounding industrial properties. There are traffic signals at the intersections of Third Street and 22nd and 23rd Streets.

25th Street

25th Street is a collector road carrying approximately 2,600 vehicles per day, which provides access directly to SR-280 northbound at either Indiana Street, or via Pennsylvania Avenue to reach the SR-280's southbound lanes. It runs in an east-west direction and provides direct access to the SFERP site.

Illinois Street

Illinois Street is a north-south collector road with two lanes of travel and parking on both sides of the street. Illinois Street carries approximately 3,400 vehicles per day.

TRAFFIC AND TRANSPORTATION Figure 3, 2000 Morning and Evening Peak Hour Volumes, Intersection Channelization and Traffic Control, lists peak hour volume data for the project vicinity prior to the construction of the Third Street light rail project and indicates the intersections with traffic signals. Staff has been advised by the San Francisco Department of Parking and Traffic that the data, though five years old, is more representative of expected traffic patterns when the light rail project is completed, as compared to existing conditions (CCSF 2005c). CCSF expects that when the light rail project construction is complete by the end of 2005, the area traffic congestion will decrease due to the streets being clear of construction equipment and an assumption that more people will use the light rail instead of private vehicles.

TRAFFIC AND TRANSPORTATION Table 2 explains the Level of Service (LOS) definitions used by CCSF to analyze traffic impacts by peak hour intersection capacity and operations. Intersection level of service is identified with letters of designation, from LOS A for least congested to LOS F for most congested.

TRAFFIC AND TRANSPORTATION Table 2
Level of Service (LOS) Criteria for Signalized Intersections

Level of Service	Average Delay (seconds per vehicle)	Traffic Flow Characteristics
A	≤ 10	Most vehicles arrive during the green phase and do not stop at all.
B	> 10 to ≤ 20	More vehicles stop, causing higher delay.

TRAFFIC AND TRANSPORTATION Table 2
Level of Service (LOS) Criteria for Signalized Intersections

Level of Service	Average Delay (seconds per vehicle)	Traffic Flow Characteristics
C	> 20 to ≤ 35	Vehicle stopping is significant, but many still pass through the intersection without stopping.
D	> 35 to ≤ 55	Many vehicles stop, and the influence of congestion becomes more noticeable.
E	> 55 to ≤ 80	Very few vehicles pass through without stopping.
F	> 80	Considered unacceptable to most drivers; intersection is not necessarily over capacity even though arrivals exceed capacity of lane groups.

Source: CCSF, p. 8.10-9

TRAFFIC AND TRANSPORTATION Table 3 provides LOS information for existing and future conditions for streets in the project area. It demonstrates that the LOS for intersections in the project vicinity operate at the C through A level, except for two morning peaks at Third Street/Cesar Chavez and Third Street/Evans Avenue, and one evening peak period at Third Street/Evans Avenue when the LOS is D. These intersections are expected to retain a LOS of at least D through 2015.

TRAFFIC AND TRANSPORTATION Table 3
Level of Service Summary for Existing, Baseline 2007, and Cumulative (2015) Conditions

Intersection	Peak Hour	Existing (2000)		Baseline (2007)		Cumulative (2015)	
		LOS	Delay *	LOS	Delay *	LOS	Delay *
Third Street/16th Street	Morning	B	12.1	C	22.8	C	25.7
	Evening	B	14.5	B	16.8	C	22.0
Third Street/20th Street	Morning	A	3.1	A	2.2	C	20.1
	Evening	A	2.8	A	3.7	C	27.4
Third Street/25th Street	Morning	B	11.9	A	5.5	B	13.2
	Evening	B	11.3	B	11.0	B	11.7
Third Street/Cesar Chavez Street	Morning	C	27.1	D	40.8	D	39.9
	Evening	C	24.5	D	39.1	D	40.0

Third Street/Evans Avenue	Morning	D	37.3	D	44.1	D	44.7
	Evening	C	24.0	C	33.5	D	36.0
Evans Avenue/Cesar Chavez Street	Morning	B	13.6	B	14.1	B	16.6
	Evening	B	19.4	C	29.9	C	31.1

* Delay in seconds per vehicle. Source: SFERP, Table 8.10-4, p. 8.10-11.

Airport

There are two major airports in the vicinity of the project site: San Francisco International Airport is approximately 15 miles south of the SFERP site, and Oakland International Airport is located approximately 10 miles east across San Francisco Bay.

San Francisco Municipal Railway

There are major MUNI Railway routes in the vicinity of the project site that serve north-south travel (See **Traffic and Transportation Figure 2**).

Caltrain

Caltrain provides commuter rail service between Santa Clara, San Mateo and San Francisco counties. The closest station to SFERP is the 22nd Street and Pennsylvania Avenue Station, which is six blocks west of the project.

Bicycle Lanes

Within the project vicinity, the CCSF Master Plan designates Evans Avenue, Innes Avenue, Cesar Chavez Street, and Third Street as bicycle lanes. Cesar Chavez Street is a Class 2 bicycle lane, and the rest are Class 3 lanes (see **TRAFFIC AND TRANSPORTATION Figure 2**). These bicycle lanes are lightly used in the vicinity of the project (CCSF 2004a).

Accident rates

The number of reported collisions in the five year period from April 1, 1998 through March 31, 2003 for the following intersections in the project vicinity are (CCSF 2004g):

23rd Street/Illinois Street	3
25th Street/Illinois Street	0
23rd Street/Third Street	18
Third Street/24th Street	5
Third Street/25th Street	8
Third Street/26th Street	2
Third Street/Cesar Chavez Street	16
Cesar Chavez Street/Tennessee Avenue	1
Cesar Chavez Street/Minnesota Avenue	0

Cesar Chavez Street/Indiana Avenue	5
Cesar Chavez Street/Pennsylvania Avenue	6
Cesar Chavez Street/280 NB on ramp	0
Pennsylvania Avenue/280 SB on ramp	0

These accident rates indicate that intersections involving Third Street have the greatest number of accidents, which is consistent with its arterial designation and its higher volume of traffic when compared with the surrounding streets.

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project may have a significant effect on traffic and transportation if the project would:

- cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections);
- exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways;
- result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- result in inadequate emergency access;
- result in inadequate parking capacity; or
- conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

DIRECT/INDIRECT IMPACTS AND MITIGATION

Construction Impacts and Mitigation

When evaluating a project's potential impact on the local transportation system, staff uses LOS measurements as the foundation on which to base its analysis. The following discussion identifies potential traffic impacts associated with the construction of the SFERP, and provides an explanation of the impact conclusion.

The AFC provides an analysis of year 2007 projected traffic conditions with and without the addition of project construction traffic trips. Project construction would be completed in 12 months. Even though construction may start in the latter half of 2006, the applicant used a 2007 baseline to coincide with peak construction activity (CH2MHILL 2005).

Staff believes that this is a reasonable baseline for analysis. The average number of construction workers would be approximately 161, while the peak workforce would consist of approximately 264 workers (construction month six), including 250 workers at the plant site and eight workers for water pipeline construction. All plant construction workers would park at the lay-down area on 25th Street, while the pipeline construction crew would park adjacent to the pipeline construction sites.

Construction Workforce Traffic

The applicant assumes an average automobile occupancy (AAO) of 1.14 persons per vehicle for commuting. Using the highest number of workers figure of 264 and an AAO rate of 1.14, results in approximately 528 one-way daily worker trips. The 528 daily trips are allotted to 264 a.m. peak hour trips, and 264 p.m. peak hour trips. The applicant has also assumed that there would be approximately ten daily trips during the lunch interval. Peak hours are considered to be between 7:00 to 9:00 a.m. and 4:00 to 6:00 p.m. LOS for the 2007 baseline plus project traffic projection would not deteriorate for any local streets except for the Third Street/Evans Avenue intersection during the evening peak commute (see **Traffic and Transportation Table 3**). Given the experience with previous projects, staff believes that the estimated construction traffic trips and assumptions about peak hour activity are reasonable.

Based on regional demographics the construction workers would probably come from the City of San Francisco (25 percent), Marin County (15 percent), East Bay area (40 percent, and San Mateo County (20 percent). Construction workers would park at the laydown site on 25th adjacent to the project site.

To reach the laydown site, workers traveling from Marin County would exit onto Cesar Chavez Street, proceeding to Third or Illinois Streets. Workers from the East Bay would use I-80 to US 101, and exit on Cesar Chavez Street proceeding to Third or Illinois Streets. The traffic would then proceed north for two blocks turning right on 25th Street to reach the laydown site. Workers from within the City would use 16th Street and Third Street, while workers coming from San Mateo County would use SR-280, exit at Evans Avenue and proceed to Third Street. The traffic would then proceed north on Third Street to 25th Street. Condition of Certification **TRANS-5** would require a construction period parking and staging plan to ensure that the project construction worker-related traffic does not result in significant degradation of intersection LOS.

Traffic and Transportation Table 4 provides projected LOS levels for major street intersections in the project vicinity for 2007 with and without project traffic, and demonstrates that project construction worker traffic would change the LOS level for evening peak at Third Street/Evans Avenue from C to D. All intersections included in the site vicinity study would be at LOS D or higher during construction and therefore attain CCSF's minimum standard of LOS D. Condition of Certification **TRANS-1** would require the applicant to prepare a traffic control plan, with review and coordination by the CCSF Public Works, and Parking and Traffic Departments. The purpose of the plan would be to identify all measures needed to prevent project construction from impeding normal road operations. Furthermore, staff is recommending that the applicant shift construction worker arrival/departure times to off-peak hours to minimize LOS deterioration.

TRAFFIC AND TRANSPORTATION Table 4
Expected Level of Service for 2007 Plus Project Construction

Intersection	Peak Hour	Projected (2007)		2007 Plus Project	
		LOS	Delay*	LOS	Delay *
Third Street/16th Street	Morning	C	22.8	C	20.8
	Evening.	B	16.5	B	19.3
Third Street/20th Street	Morning	A	2.2	A	2.4
	Evening	A	3.7	A	2.7
Third Street/23rd Street	Morning	A	2.9	A	4.1
	Evening	A	6.0	A	4.5
Third Street/25th Street	Morning	A	5.5	A	9.0
	Evening	B	11.0	B	14.8
Third Street/Cesar Chavez Street	Morning	D	40.8	D	53.1
	Evening	D	39.1	D	46.6
Third Street/Evans Avenue	Morning.	D	44.1	D	49.3
	Evening	C	33.5	D	43.9
Evans Avenue/Cesar Chavez Street	Morning	B	14.1	B	16.9
	Evening	C	29.9	C	26.4

Source: CCSF Table 8.10-6, p. 8.10-21 - * Delay in seconds per vehicle

Construction Truck Traffic

Construction of the generating plant would require the use and installation of heavy equipment and associated systems and structures. Heavy equipment would be used throughout the construction period, including trenching and earthmoving equipment, forklifts, cranes, cement mixers and drilling equipment. Project construction is expected to require 40 truck trips per day. Condition of Certification **TRANS-1**, as proposed, would make it likely that trips would occur during off-peak traffic hours.

In-bound truck traffic would reach the project site by traveling on U.S. 101 northbound to SR-280 northbound, exiting on Evans Avenue, traveling east on Evans Avenue to Third Street, north on Third Street to 25th Street, and east on 25th Street to the project site.

Trucks leaving the project site would travel from 25th Street to Third Street southbound, to Cesar Chavez Street westbound, to Pennsylvania Avenue northbound, to I-80 southbound, and then to U.S. 101 southbound. Under Condition of Certification **TRANS-1**, as proposed, construction truck traffic would not occur during the morning or evening peak commute periods and would not significantly degrade the expected LOS on the local streets.

TRAFFIC AND TRANSPORTATION Table 5 provides data on project construction worker and truck trip generation.

TRAFFIC AND TRANSPORTATION Table 5
Peak Construction Trip Generation for the Proposed Project

		AM Peak Hour		PM Peak Hour	
Vehicle Type	ADT	In	Out	In	Out
Construction Personnel [a]	528	264	10	10	264
Delivery Trucks [b]	10	0	0	0	0
Heavy Vehicles and Trucks [c]	30	0	0	0	0
Total	**568**	**264**	**10**	**10**	**264**

. Source: CCSF, Table 8.10-5, p. 8.10-20

[a] Approximately 10 construction personnel trips (5 inbound and 5 outbound) associated with lunch and other business-related trips would occur from 9:00 a.m. to 4:00 p.m. (outside of peak hours).
[b] Delivery and other truck trips would occur on weekdays, from 9:00 a.m. to 4:00 p.m. (outside of peak hours).
[c] Heavy Vehicles and trucks trips would be scheduled outside of peak hours pursuant to proposed Condition of Certification **TRANS-1**.

Construction Phase Transport of Hazardous Materials and Waste

Deliveries would include small quantities of hazardous materials to be used during project construction, and during the preconstruction period contamination solids from cleanup operations would be removed. The applicant has stated that the deliveries of hazardous materials to and from the site would be conducted in accordance with federal and State code. Staff has traveled the preferred route for transporting hazardous materials which involves the SR-280 off-and-on ramps, Cesar Chavez, Third and 25th Streets. The relatively short route goes through a commercial/industrial area with no residences, schools, hospitals, or other sensitive areas. Therefore, staff believes the route is appropriate.

Oversize and Overweight Load

Transportation of equipment that would exceed the load size and limits of certain roadways would require special permits from Caltrans. California Streets and Highways Code sections 117 and 660-672, and California Vehicle Code section 35780 et seq., require permits for the transportation of oversized loads on State and county roads. Staff proposes Conditions of Certification **TRANS 2 & 3** which would require the applicant to secure permits from Caltrans for oversized loads, encroachment and activities within road right-of-ways.

There are no height/weight restrictions or maximum street capacities for CCSF streets and highways in the project construction truck route (CCSF 2004a). Staff has proposed Condition of Certification **TRANS-2** to ensure compliance with county and Caltrans vehicle size and weight requirements. Condition of Certification **TRANS-6** would require a road mitigation plan for any roads damaged by oversize or overweight vehicles.

Hazards Due to Project Design Features

The Pennsylvania Avenue I-280 off-ramp may be a safety consideration for project construction trucks due to this ramp's steep curve. Staff noted this item in a June 4, 2004 data request to the applicant. The applicant's July 6, 2004 response noted Caltran's responsibility for safety items and related improvements on this freeway off-ramp. The applicant's response acknowledged the fact that the project would temporarily add more truck traffic to this ramp, but stated that it would not affect the safety of individual trucks. Potential safety hazards and any mitigation measures needed for this off-ramp should be part of the Condition of Certification **TRANS-1** traffic control plan coordination and review process that the applicant will be required to initiate with Caltrans.

There are existing housing developments near some of the project truck routes, and more housing is proposed in the area, with the possibility of children traveling to school on school district or Municipal Railway buses. Similar to the requirement above for coordination with Caltrans, Condition of Certification **TRANS-1** requires the applicant to discuss its truck travel routes with the San Francisco School District.

Linear Facilities

The 900-foot, 12-inch diameter natural gas pipeline connection would be on-site and would connect with PG&E's line 101. Line 101 is a 24-inch gas transmission pipeline located west of the project site at the intersection of 25th Street and Illinois Street. The new gas pipeline would run north from the SFERP site to 25th Street, and then proceed 800 feet west to connect to the existing PG&E pipeline.

The City of San Francisco would supply process water to the SFERP for cooling purposes by means of a proposed 4,000-foot (approximate) underground pipeline involving Marin, Mississippi and Cesar Chavez streets. An underground pumping station would be constructed on Marin Street.

Potable water would be supplied to the power plant by a proposed 300-foot underground pipeline that will connect to an existing water main in Cesar Chavez Street. Water supply pipeline construction would include excavation of portions of local roadways, and could temporarily impact vehicle and pedestrian uses.

The electrical transmission connection would be to the north and west across a PG&E service road to the Potrero substation.

The eight pipeline construction employees would park adjacent to their work sites. Water pipeline construction would require excavation in local roadways, and could temporarily interfere with vehicle and pedestrian use. Condition of Certification **TRANS-1** would require mitigation of this impact by ensuring that the traffic construction plan address the issue of maintaining access to residential and commercial properties.

Operation Impacts and Mitigation

Employee and Truck Traffic

Operation of the generating plant would require a labor force of 11 full-time employees who would generate 22 daily one-way trips. Other project-related trips (i.e., delivery trucks, visitors, and other business-related trips) are expected to generate 60 trips, for a total of 100 daily trips. These trips would generate 11 morning peak hour and 11 evening peak hour trips. Staff assumes that operational trips would follow the same routes as for construction trips, and expects that these minor additions to surrounding local streets and highways would not significantly affect the LOS of these roads.

Transport of Hazardous Materials and Waste

The transportation and handling of hazardous substances associated with the project can increase roadway hazard potential. Impacts associated with hazardous material transport to the facility can be mitigated to a level of insignificance by compliance with existing federal and State standards established to regulate the transportation of Hazardous Substances. Condition of Certification **TRANS-4** requires adherence to federal and State regulations for hazardous materials transport.

The California Department of Motor Vehicles specifically licenses all drivers who carry hazardous materials. Drivers are also required to check for weight limits and conduct periodic brake inspections. Commercial truck operators handling hazardous materials are also required to take instruction in first aid and procedures on handling hazardous waste spills. Drivers transporting hazardous waste are required to carry a manifest, which is available for review by the California Highway Patrol at inspection stations along major highways and interstates.

The California Vehicle Code and the Streets and Highways Code (Sections 31600 through 34510) ensure that the transportation and handling of hazardous materials are done in a manner that protects public safety. Enforcement of these statutes is under the jurisdiction of the California Highway Patrol.

Project operation would generate hazardous wastes including herbicides, pesticides, and water treatment chemicals. Operation would also require 14 deliveries per year of aqueous ammonia, or 28 one-way trips. If project operation results in the use of lower concentrations of aqueous ammonia, more frequent delivery trips would be required. Proposed Condition of Certification **TRANS-1** would require that hazardous waste deliveries would occur during off-peak hours.

A licensed hazardous waste transporter would haul project waste to one of three hazardous waste landfills near the project area. Waste haulers would access the project site by traveling on Illinois Street to 23rd Street. Specific inbound and outbound hazardous materials and waste routes would be the same as for construction trucks. As noted earlier, staff believes the preferred route to and from SR-280 is appropriate.

Hazardous wastes from the local waste landfills would be transported on SR-280 and 101 south to additional highways for permanent disposal at one of three Class 1 hazardous waste facilities in Southern California.

The handling and disposal of hazardous substances are also addressed in the **WASTE MANAGEMENT, WORKERS SAFETY AND FIRE PROTECTION** and **HAZARDOUS MATERIALS** sections of this report.

Emergency Response

The project would be equidistant from two San Francisco Fire Department stations: No. 37 at Wisconsin Street and 22nd Street, and No. 25 at 3rd and Marin Streets. Station No. 25 would typically be the first to respond to the project; the emergency vehicle route from Station No. 25 to the project site would be Third Street to 25th Street to the site; response time would be two minutes from both stations (CCSF 2004c).

CCSF operates all City medical units in conjunction with the Fire Department. The two closest medical units with ambulance/paramedic service are Fire Station No. 17 at Shakespeare and Ingalls Streets, and Fire Station No. 9 at Jerrold and Toland Streets. Response time to the site for both would be four minutes. Station No. 9 would typically respond to the project; this station has a truck for heavy rescue (CCSF 2004c).

Airport Operations

Because the nearest airport, Oakland International Airport, is about 10 miles from the project site, staff does not expect that the project would have any impact on aviation safety.

Plume Analysis

The facility's turbines would not produce water vapor plumes. The cooling tower has the potential for producing occasional small water vapor plumes, primarily in the morning hours or during cooler weather periods. Staff does not expect project-related water vapor plumes to reach any of the adjacent public roads.

CUMULATIVE IMPACTS AND MITIGATION

The construction of four projects could coincide with SFERP construction:

- Segment C (23rd Street to Cesar Chavez Street) of the MUNI Light Rail Transit extension;
- Proposed 71 unit residential condominium and retail project at 1275 and 1301 Indiana Street; this project would be a 183,000 sq. ft. planned unit development (CCSF 2004d).
- Proposed 141 residential unit and retail (restaurant and warehouse) project at 2235 3rd Street (20th and 3rd/Illinois Streets); this project would be a 167,500 sq. ft. planned unit development (CCSF 2004d).
- The Port of San Francisco is constructing a bridge across the Islais Creek channel along the line of Illinois Street. The 60-foot long bridge would provide direct rail

service to the Port's Pier 80 cargo facility. Vehicles and bicyclists could also use the bridge when trains are not present (Port of San Francisco 2005a).

The applicant contacted MUNI staff in February 2005 to determine the status of the Segment C project. Construction is expected to be complete by the end of 2005, with the number of construction trips tapering off (Port of San Francisco 2005b). Based on this information, staff understands that the Third Street Rail extension will be completed prior to construction of SFERP and therefore, there would be no overlapping traffic impacts.

The proposed 71 unit residential/retail project has received a conditional use permit but has not submitted the application for a building permit. It is unclear when the application for the permit will be submitted though it must occur within the next two years (CCSF 2005a). The proposed 141 unit residential/retail project is on hold and undergoing design changes (CCSF 2005b). Staff notes the uncertain construction schedules for both of these projects, and the LOS of C or better in the vicinity, although LOS at the intersection of Third Street/Cesar Chavez is expected to deteriorate between 2005 and 2015. The possibility of cumulative traffic impacts in the Third Street area related to the residential/retail projects, provides further justification for staff's recommendation that Condition of Certification **TRANS-1** be adopted, with its requirement that construction worker commute trips be shifted to off-peak times.

The Illinois Bridge construction project over Islais Creek has begun and is expected to last for approximately 16 months. The bridge would be located about 0.25 miles south of the SFERP near Third Street and Tulare Avenue. Approximately 20 workers will be involved on a daily basis. Truck deliveries will average five to six per day (Port of San Francisco 2005b). Staff believes that implementation of Condition of Certification **TRANS-1** will mitigate any adverse cumulative traffic impact related to the Illinois Bridge construction project.

Staff has reviewed the demographic information contained in the **SOCIOECONOMICS** section of this Preliminary Staff Assessment and is aware that there is a greater than 50 percent minority within a six and one mile radius of the SFERP.

COMPLIANCE WITH LORS

The applicant has stated its intention to comply with all applicable LORS. With adoption of the proposed conditions of certification, staff has concluded that the project will comply with relevant LORS.

CONCLUSIONS

1. With implementation of the proposed conditions of certification the project would be consistent with the Circulation Element of the CCSF General Plan and all other applicable LORS. Staff is recommending that the applicant shift construction worker arrival/departure times to off-peak traffic periods to prevent significant LOS deterioration on the local road network, as noted in Condition of Certification

TRANS-1. This shift would ensure that local road and highway demand resulting from the daily movement of workers and materials would not increase beyond significance thresholds established by CCSF. During the operational phase, increased roadway demand resulting from the daily movement of workers and materials would be minimal.

2. The applicant should be required to prepare a Traffic Control Plan as proposed in Condition of Certification **TRANS-1,** with review and coordination with Caltrans, including a discussion of any safety issues resulting from the project adding more truck traffic on the SR-280 off-ramp to Pennsylvania Avenue. Similarly, as proposed in Condition of Certification **TRANS-1**, the applicant should be required to initiate review and coordination with the San Francisco School District regarding any school bus routes affected by project-related traffic.
3. Because of the distance of the project from airports, the project would not impact aviation safety.
4. City/County of San Francisco City/County of San Francisco There would be transportation of hazardous materials during construction and operation. There is good road access for the transportation of hazardous materials. With implementation of the proposed conditions of certification, potential problems would not exceed significance thresholds established by the Highway Patrol.
5. CCSF's Transportation Element contains a policy to reduce peak period congestion through the promotion of flexible work schedules at worksites throughout the City, which is consistent with staff's Condition of Certification **TRANS-1** recommendation to have workers travel during off-peak times.
6. Staff has not identified any unmitigated adverse direct or cumulative impact on the local transportation system related to the construction and operation of the SFERP. Therefore, there is no adverse and/or disproportionate traffic and transportation impact on the minority or low-income population identified in **SOCIOECONOMICS Figure 1**.

PROPOSED CONDITIONS OF CERTIFICATION

TRANS-1 The project owner shall develop a construction traffic control plan that limits peak hour construction-period truck and commute traffic in coordination with the City and County of San Francisco (CCSF) Public Works Department. The project owner shall also consult with Caltrans regarding any freeway access and on/off-ramps, the San Francisco School District regarding school bus routes, and the CCSF staff dealing with traffic regulation enforcement. Specifically, the overall traffic control plan shall include the following:

- Require the primary contractor and major subcontractors to advise workers to develop and implement a construction employee carpool program;
- Through worker education and shift scheduling, maximize worker commute trips during off-peak hours (off-peak hours are (1) before

6:00 AM; (2) between 9:00 AM and 4:00 PM; and (3) after 6:00 PM or other hours as agreed to by the CPM;

- Schedule heavy vehicle equipment and building material deliveries as well as the movement of materials (i.e. hazardous) and equipment to the site, including the adjacent lay-down area to occur during off-peak hours; and
- Coordinate with CCSF and other applicable agency staff to mitigate any potential adverse traffic impacts from other proposed construction projects that may occur during the SFERP construction phase (i.e. Illinois Bridge).

The construction traffic control plan shall also address the following issues to control construction traffic for linear facilities:

- Timing of water and gas pipeline construction such that all pipeline construction affecting local roads take place outside the peak traffic periods to avoid traffic flow disruptions, or other hours as agreed to by the CPM;
- Signing, lighting, and traffic control device placement;
- Temporary travel lane closures and potential need for flagmen;
- Maintaining access to adjacent residential and commercial properties; and
- Emergency access.

Verification: At least 60 days prior to start of site mobilization, the project owner shall provide to the CCSF Department of Parking and Transportation and the Public Works Department, the California Highway Patrol for review and comment, and to the CPM for review and approval, a copy of the construction traffic control plan. The plan must document consultation with Caltrans and the San Francisco School District.

TRANS-2 The project owner shall comply with Caltrans and other affected jurisdictions' limitations on vehicle sizes and weights. In addition, the project owner or their contractor shall obtain necessary transportation permits from Caltrans and all relevant jurisdictions for roadway use.

Verification: In the Monthly Compliance Reports, the project owner shall submit copies of any oversize and overweight transportation permits received during that reporting period. In addition, the project owner shall retain copies of these permits and supporting documentation in the on-site compliance file for at least six months after the start of commercial operation.

TRANS-3 The project owner shall ensure compliance with Caltrans and other relevant jurisdictions' limitations for encroachment into public rights-of-way, and shall obtain necessary encroachment permits from Caltrans and all relevant jurisdictions.

Verification: In the Monthly Compliance Reports, the project owner shall submit copies of any encroachment permits received during that reporting period. In addition, the project owner shall retain copies of these permits and supporting documentation in the on-site compliance file for at least six months after the start of commercial operation.

TRANS-4 The project owner shall ensure that permits and/or licenses are secured from the California Highway Patrol and Caltrans for the transport of all hazardous materials, and that all federal and state regulations for the transport of hazardous materials are observed.

Verification: The project owner shall include in its Monthly Compliance Reports during construction and Annual Compliance Reports during operations copies of all permits and licenses acquired by the project owner concerning the transport of hazardous materials. In addition, the project owner shall retain copies of these permits and licenses in the on-site compliance file for at least six months during construction and operation of the power plant.

TRANS-5 Prior to the construction of the power plant and all related facilities, the project owner shall develop a parking and staging plan for all phases of project construction, to enforce a policy that all project related parking occurs on-site.

Verification: At least 30 days prior to the start of site mobilization, the project owner shall submit the plan to the CCSF Public Works Department for review and comment, and to the CPM for review and approval. The material submitted to the CPM shall include documentation of the Public Works Department's review and comments. Monthly Compliance Reports submitted to the CPM shall describe the project owner's actions to ensure that this condition is being met.

TRANS-6 Prior to the beginning of site mobilization activities, the project owner shall prepare a mitigation plan for any identified street damaged by oversize or overweight vehicles and underground pipeline construction to the CCSF Public Works Department, and the CPM. The intent of this plan is to ensure that any streets damaged by oversize or overweight vehicles serving the project and underground pipeline construction will be repaired and reconstructed to original or as near original condition as possible. This plan shall:

- Document the pre-construction condition of the surface streets in the vicinity of the site and those along the process water supply pipeline route. Prior to the start of site mobilization, the project owner shall provide to the CPM photographs or videotape of the affected streets.
- Document any portions of streets that may be inadequate to accommodate oversize or large construction vehicles, and identify necessary remediation measures;
- Provide appropriate bonding or other assurances to ensure that any damage to a street due to construction activity will be remedied by the project owner;

- Relocate utility poles, if necessary, to insure that adequate clear zones are established along the property frontage; and
- Reconstruct portions of streets that are damaged by project construction including the use of oversize or overweight construction vehicles, and the installation of underground utilities.

Verification: At least 90 days prior to the start of site mobilization, the project owner shall submit a mitigation plan focused on restoring identified streets to their pre-project condition to the CCSF Public Works Department for review and comment, and to the CPM for review and approval.

At least 90 days prior to the start of pipeline construction, the project owner shall submit a separate street damage mitigation plan to the CCSF Public Works Department for review and comment and to the CPM for review and approval.

Within 90 days following the completion of construction, the project owner shall provide photo/videotape documentation to the CCSF Public Works Department, and the CPM that the damaged streets have been restored to their pre-project condition.

REFERENCES

CCSF Planning Department. General Plan Transportation Element. July 6,1995.

CCSF 2004a. Phone conversation between Jerry Robbins, Transportation Planner, CCSF Department of Parking and Traffic with Ken Peterson, Energy Commission staff. May 10, 2004.

CCSF 2004b. E-mail from Jerry Robbins to Ken Peterson on May 11, 2004.

CCSF 2004c. Phone conversation between Eric Chow, Intern, CCSF Fire Department, Chief's Office, and Ken Peterson on May 12, 2004.

CCSF 2004d. E-mail from Tim Blomgren, Planner, to Ken Peterson on May 12, 2004.

CCSF 2004e. E-mail from Bill Wyco, CCSF Planning Department to Ken Peterson regarding transportation impact significance criteria, sent on May 18, 2004.

CCSF 2004f. E-mail from Bill Wyco to Ken Peterson regarding transportation study criteria, sent on May 18, 2004.

CCSF 2004g. E-mail from Jerry Robbins to James Adams, Energy Commission staff, regarding vehicle collisions at local intersections near the SFERP site, sent on June 14, 2005.

CCSF 2005a. Personal communication between Matt Snyder, Planning Department, and James Adams on June 13, 2005.

CCSF 2005b. Personal communication between Tamy Chan, Planning Department, and James Adams on June 13, 2005.

CCSF 2005c. Personal communication with Jerry Robbins, Department of Parking and Traffic, James Adams.

CH2MHILL 2005. Personal communication between John Carrier, Program Manager, and James Adams on August 25, 2005.

Port of San Francisco 2005a. E-mail from David Beaupre, Senior Waterfront Planner, to James Adams on May 23, 2005.

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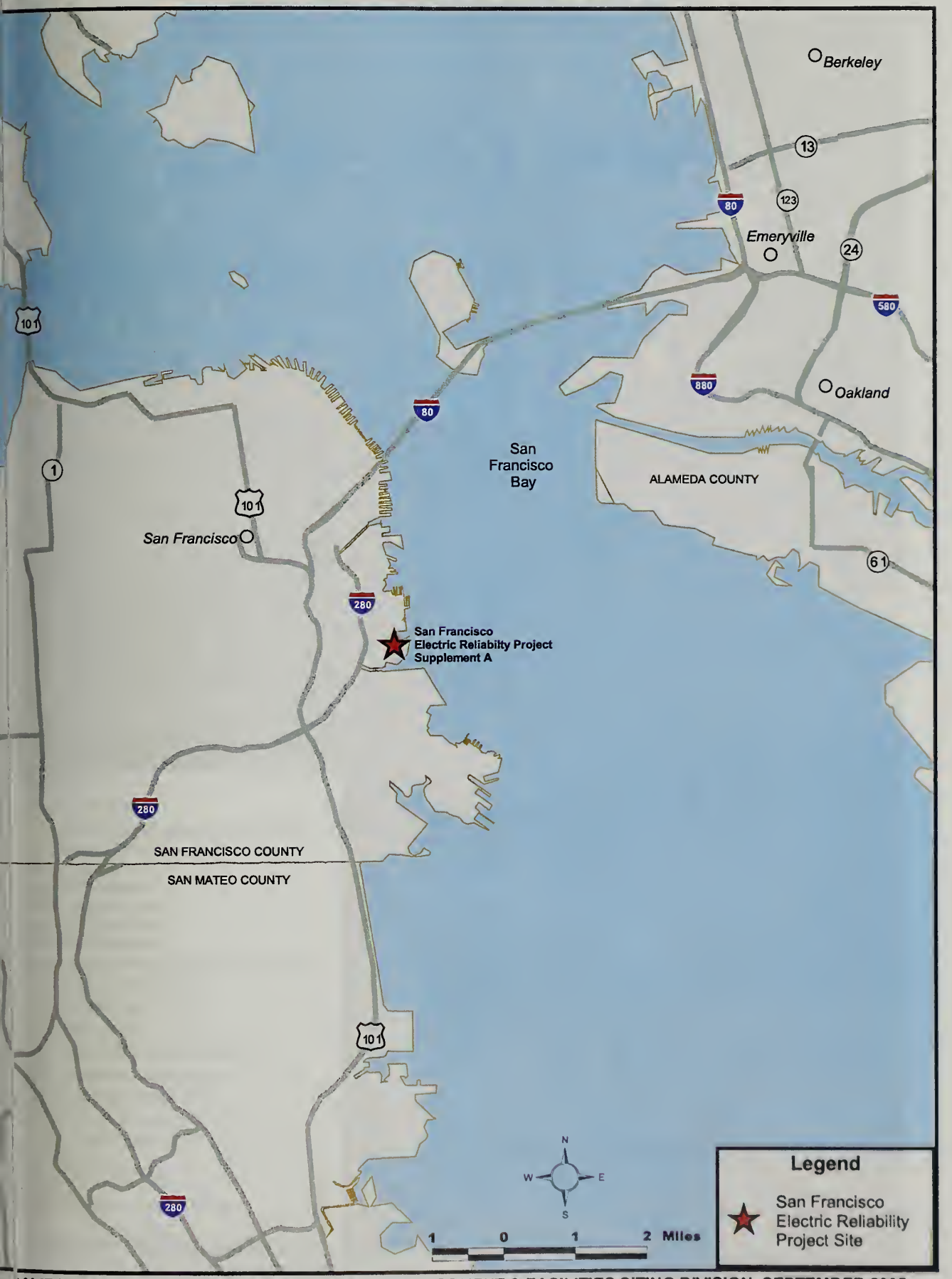
SFCMP 2003. San Francisco County Congestion Management Plan. San Francisco County Transportation Authority. Dated November 2003.

SFERP 2004a (City and County of San Francisco/Blout) 2004a (tn: 31130). Application for Certification , San Francisco Electric Reliability Project (04-AFC-1). Submitted to the California Energy Commission March 18, 2004.

TRAFFIC AND TRANSPORTATION - FIGURE 1

San Francisco Electric Reliability Project Supplement A - Regional Transportation System



CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: California Energy Commission Statewide Transmission & Power Plant Maps 2005

TRAFFIC AND TRANSPORTATION - FIGURE 2

San Francisco Electric Reliability Project Supplement A -
Local Transportation Network near the Project Site

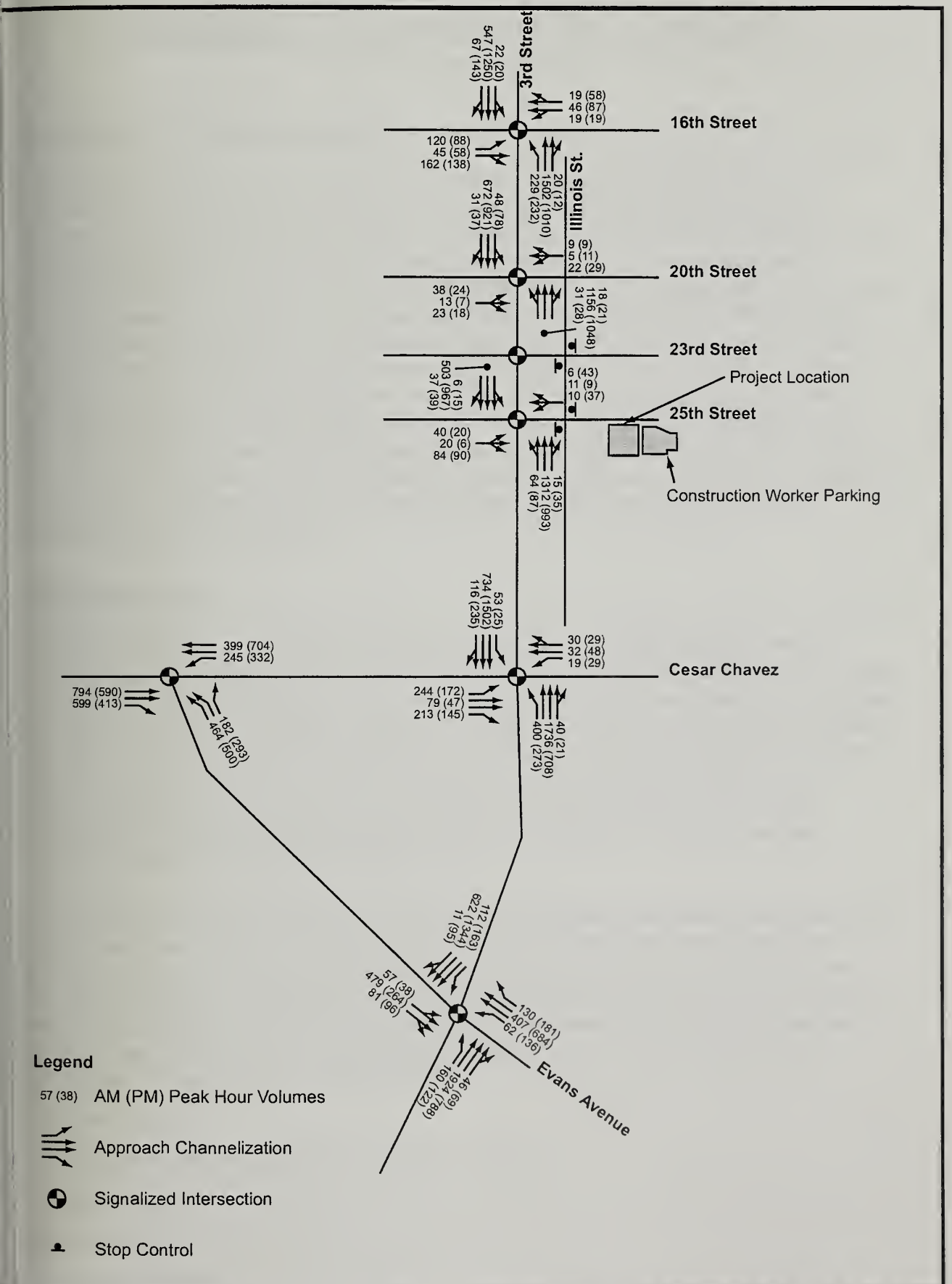
CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: AFC - Supplement A - Figure 8.10-2

TRAFFIC AND TRANSPORTATION - FIGURE 3

San Francisco Electric Reliability Project - Supplement A -

Existing (2000) AM and PM Peak Hour Volumes, Intersection Channelization and Traffic Control



CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: AFC - Supplement A - Figure 8.10-3

TRANSMISSION LINE SAFETY AND NUISANCE

Obed Odoemelam, Ph.D.

SUMMARY OF CONCLUSIONS

The applicant, the City and County of San Francisco, proposes to transmit the power from the San Francisco Electric Reliability Project to the Pacific Gas and Electric transmission grid through a new 3,000-foot, underground115-kilovolt transmission line connecting the facility with Pacific Gas and Electric's existing Potrero Substation. Undergrounding is the most effective method of safely minimizing the intensity of fields from the conductors of a given line while also reducing the area of the potential long-term magnetic field exposure of the present health concern. The proposed line would traverse a mostly industrial area with no nearby residences, thereby eliminating the potential for such residential exposure. However, there would still be the potential for insignificant exposure to people who traverse the area. The proposed underground placement, operating, and maintenance plan would be according to standard Pacific Gas and Electric practices, which conform with applicable laws, ordinances, regulations and standards. Staff recommends approval of the line as proposed and without requirements for further mitigation.

INTRODUCTION

The electrical energy from the proposed San Francisco Electric Reliability Project (SFERP) would be delivered to the Pacific Gas and Electric (PG&E) transmission power grid through a new underground 115-kilovolt (kV) transmission line extending 3,000 feet to connect the project's on-site switchyard to PG&E's existing 115-kV Potrero Electrical Substation to the northeast. The proposed line would be owned and operated by the applicant, the City and County of San Francisco (CCSF). Since the line would be located within the PG&E service area, it would be designed, built, and operated according to PG&E's standards and practices for underground lines and related structures (SFPUC 2005a pp. 5-1 through 5-8).

The purpose of this staff analysis is to assess the proposed line design and operational plan to determine whether its related field and non-field impacts would constitute a significant environmental hazard in the area around the proposed route. All related health and safety laws, ordinances, regulations, and standards (LORS) are currently aimed at minimizing such hazards. Staff's analysis focuses on the following issues as related primarily to the physical presence of the line, or secondarily to the physical interactions of its electric and magnetic fields:

- aviation safety;
- interference with radio-frequency communication;
- audible noise;
- fire hazards;
- hazardous shocks;

- nuisance shocks; and
- electric and magnetic field (EMF) exposure.

LAWS, ORDINANCES, REGULATIONS AND STANDARDS

TRANSMISSION LINE SAFETY AND NUISANCE TABLE 1
Laws, Ordinances, Regulations and Standards (LORS)

Applicable LORS	Description
Aviation Safety	
Federal	
Title 14, Part 77 of the Code of Federal Regulations (CFR),"Objects Affecting the Navigable Space"	Describes the criteria used to determine the need for a Federal Aviation Administration (FAA) "Notice of Proposed Construction or Alteration" in cases of potential obstruction hazards.
FAA Advisory Circular No. 70/7460-1G, " Proposed Construction and/or Alteration of Objects that May Affect the Navigation Space"	Addresses the need to file the "Notice of Proposed Construction or Alteration" (Form 7640) with the FAA in cases of potential for an obstruction hazard.
FAA Advisory Circular 70/460-1G, "Obstruction Marking and Lighting"	Describes the FAA standards for marking and lighting objects that may pose a navigation hazard as established using the criteria in Title 14, Part 77 of the CFR.
Interference with Radio Frequency Communication	
Federal	
Title 47, CFR, Section 15.2524, Federal Communications Communication (FCC)	Prohibits operation of devices that can interfere with radio-frequency communication.
State	
California Public utilities Commission (CPUC) General Order 52 (GO-52)	Governs the construction and operation of power and communications lines to prevent or mitigate interference.
Audible Noise	Not to exceed applicable local noise ordinances – (no design-specific federal or state regulations for noise from transmission lines).
Hazardous and Nuisance Shocks	
State	
CPUC GO-95, "Rules for Overhead Electric Line Construction"	Governs clearance requirements to prevent hazardous shocks, grounding techniques to minimize nuisance shocks, and maintenance and inspection requirements.

Applicable LORS	Description
Title 8, California Code of regulations (CCR) Section 2700 et seq, "High Voltage Safety Orders"	Specifies requirements and minimum standards for safely installing, operating, working around, and maintaining electrical installations and equipment.
National Electrical Safety Code	Specifies grounding procedures to limit nuisance shocks. Also specifies minimum conductor ground clearances.
Industry Standards	
Institute of Electrical and Electronics Engineers (IEEE) 1119, "IEEE Guide for Fence Safety Clearances in Electric-Supply Stations"	Specifies the guidelines for grounding-related practices within the right-of-way and substations.
Electric and Magnetic Fields	
State	
GO-131-D, CPUC "Rules for Planning, and Construction of Electric Generation Line and Substation Facilities in California"	Specifies application and noticing requirements for new line construction including EMF reduction.
CPUC Decision 93-11-013	Specifies CPUC requirements for reducing power frequency electric and magnetic fields.
Industry Standards	
American national Standards Institute (ANSI/IEEE) 644-1944 Standard Procedures for Measurement of Power Frequency Electric and Magnetic Fields from AC Power Lines	Specifies standard procedures for measuring electric and magnetic fields from an operating electric line.
Fire Hazards	
State	
4 CCR Sections 1250-1258, Fire Prevention Standards for Electric Utilities"	Provides specific exemptions from electric pole and tower firebreak and conductor clearance standards and specifies when and where standards apply.
GO-128, CPUC, "Rules for Underground Electric Line Construction.	Covers required clearances, grounding techniques, maintenance, and inspection requirements.

SETTING

As noted in the **Project Description** section, the site for the proposed SFERP is a 4-acre parcel owned by the CCSF and located south of 25th Street approximately 700 feet east of Illinois Street. The site was chosen in part for its proximity to PG&E's Potrero Substation to which it would be connected. Such proximity would reduce the

length of the connecting transmission line to be used (SFPUC 2005a, p.5-1). The project site and the proposed line route are within an industrial area, with the nearest residential neighborhood located approximately 1600 feet to the west (SFPUC 2005a, pp. 8.4-2 through 8.4-6). This distance to residences would minimize the potential for any of the residential field exposure at the root of the present health concern. The only project-related EMF exposures of potential significance are the short-term exposures of plant workers, regulatory inspectors, maintenance personnel, visitors, or individuals in the immediate vicinity of the buried line. These types of exposures are short term and well understood as not significantly related to the present health concern.

PROJECT DESCRIPTION

The proposed SFERP transmission project will consist of the segments listed below:

- An underground 115-kV line extending approximately 3,000 feet from the project's 115-kV switchyard to the connection point at PG&E's Potrero Substation to the north east; and
- The project's on-site 115-kV switchyard and two related underground-to-aboveground transition structures at the PG&E Potrero Substation connection point.

The line's conductors would be encased in specific shields within a concrete casing buried according to PG&E practices, which ensure safety, efficiency, and maintainability. Placing line conductors in burial casings brings them closer together than with similar overhead lines. Since such closeness enhances the cancellation effects of fields from the individual conductors, the intensity of lines from underground lines is usually lower at the same distance, than for similar overhead lines. The proposed underground-to-aboveground transition structures at the Potrero Substation would be of dimensions typical of similar PG&E lines.

As more fully discussed by the applicant (SFPUC 2005a, p. 5-1), the proposed route would begin from the project's switchyard and exit north from the project site into 25th Street, proceeding west along 25th Street until turning north into Michigan Street. It would then turn west from Michigan Street into 24th Street and proceed further to intersect Illinois Street. From there, it would continue northward to the point of connection at the PG&E Potrero Switchyard. The applicant specified two alternative routes for entry from Illinois Street into the Potrero Switchyard. None would significantly change the presently low potential for long-term residential field exposures of concern.

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

DIRECT IMPACTS AND MITIGATION

The potential magnitude of the line impacts of concern in this analysis depends on compliance with the listed LORS whose related mitigation measures have been established as adequate to maintain such impacts below levels of potential significance. The nature of these individual impacts is discussed below together with the potential for compliance with the applicable LORS.

Aviation Safety

Any potential hazard to area aircraft would relate to the potential for collision with the line or its support structures when they intrude into the navigable air space. Compliance with the regulations in TLS&N Table 1 is usually necessary to minimize the collision hazard related to this intrusion and also ensure the adequacy of identifying markings when necessary.

Since the proposed is an underground line, its presence would be insignificant regarding these collision-related aviation hazards. The only related overhead structures would be the two underground-to-aboveground structures to be located at the Potrero Substation. As noted by the applicant (SFPUC 2005a, p. 5-4), the height of this transition-related structure would not be more than those of the existing structures at the Substation all of which are much shorter than the 200 feet regarded by the FAA as triggering the concern about aviation safety. Furthermore, the line would be in an energy production and transmission area with existing lines of similar voltage and structural dimensions. The nearest airport is the Oakland International Airport, which, at 34,000 feet to the east, is further away than the 20,000 feet that triggers FAA notification. Given these conditions, staff considers the proposed underground line and related structures as not posing an obstruction-related aviation hazard to area aircraft as defined using current FAA criteria. Therefore, no FAA "Notice of Construction or Alteration" would be required.

Field Effects

The electric fields from power lines and similar sources produce two types of perceivable effects known as corona effects or field effects. Corona effects result from air ionization by electric fields at the surface of energized conductor or suspension hardware. The noted interference with radio-frequency communication and audible noise result from these corona effects. Since electric fields are unable to penetrate most materials, including the soil, such electric field effects are not associated with underground lines and would therefore, not be experienced along the route of the proposed line.

Fire Hazards and Nuisance and Hazardous Shocks

The fire prevention regulations in TLS&N Table 1 are aimed at fires that could be caused by sparks from conductors of overhead lines, or that could result from direct contact between the line and nearby trees and other combustible objects. Those regulations do not apply to this and most underground lines. The only overhead structures would be the underground-to-aboveground transition structures to be located at the Potrero Substation where there are no nearby combustible objects.

The hazardous shocks that are addressed by the regulations and standards in TLS&N Table 1 are those that could result from direct or indirect contact between an individual and the energized line whether overhead or underground. Such shocks are capable of serious physiological harm or death and remain a driving force in the design and operation of transmission and other high-voltage lines. The applicable regulation for underground lines is GO-128, with which the applicant intends to comply (SFPUC 2005a, p. 5-5).

Electric and magnetic field (EMF) exposure

The possibility of deleterious health effects from electric and magnetic field exposure has increased public concern in recent years about living near high-voltage lines. It is because both fields occur together whenever current flows that exposure to them is generally described as EMF exposure. The available evidence as evaluated by the California Public Utilities Commission (CPUC), other regulatory agencies, and staff, has not established that such fields pose a significant health hazard to exposed humans. However, staff considers it important, as does the CPUC, to note that while such a hazard has not been established from the available evidence, the same evidence does not serve as proof of a definite lack of a hazard. Staff, therefore, considers it appropriate in light of present uncertainty, to recommend reduction of such fields to the extent feasible without affecting safety, efficiency, reliability and maintainability.

While there is considerable uncertainty about EMF health effects, the following facts have been established from the available information and have been used to establish existing policies:

- Any exposure-related health risk to the exposed individual will likely be small.
- The most biologically significant types of exposures have not been established.
- Most health concerns are about the magnetic field.
- The measures employed for such field reduction can affect line safety, reliability, efficiency, and maintainability, depending on the type and extent of such measures.

The related rules and regulations in TLS&N Table 1 are intended to minimize such fields while ensuring the necessary safety and reliability.

In California, the CPUC (which regulates the installation and operation of high-voltage lines) has determined that only no-cost or low-cost measures are presently justified in any effort to comply with the listed rules and regulations as necessary to reduce power line fields beyond levels existing before the present health concern arose. The CPUC has further determined that such reduction should be made only in connection with new or modified lines. It requires each utility within its jurisdiction to establish EMF-reducing measures and incorporate such measures into the designs for all new or upgraded power lines and related facilities within their respective service areas. The CPUC further established specific limits on the resources to be used in each case for field reduction. Such limitations were intended by the CPUC to apply to the cost of any redesign to reduce field strength or relocation to reduce exposure. Utilities, which are not within the jurisdiction of the CPUC, voluntarily comply with these CPUC requirements. This CPUC policy resulted from assessments made to implement CPUC Decision 93-11-013. The CPUC is currently reassessing the EMF health issues to consider the need for any changes to present policy. Since electric fields are not encountered around underground lines as previously noted, humans would not be exposed along the proposed route.

Not only does undergrounding produce the lowest magnetic fields possible from a given line, the related close conductor placement also causes the intensity to diminish more

rapidly with distance from the buried line than with the overhead counterpart at the same current flow rates. However, since the distance to the underground conductors would be less than from the individual to the overhead counterpart, the individual's exposure level would be greater, although only within the smaller impact zone for the underground line. Such exposures are more likely to be short-term in the aggregate given the narrowness of the underground line's field impacts zone. Such short-term exposures are well known and understood as not significantly related to the modern health concern.

Field intensities are estimated or measured for a height of one meter above the ground, in units of kilovolts per meter (kV/m), for the electric field, and milligauss (mG) for the companion magnetic field. Their magnitude depends on line voltage (in the case of electric fields), the geometry of the support structures, degree of cancellation from nearby conductors, distance between conductors and, in the case of magnetic fields, amount of current in the line.

Given the shorter impact zone of underground line magnetic fields, the extent of their related long-term residential exposures is much less than for similar overhead lines. Therefore, staff regards the proposed undergrounding as the most effective field strength reduction method and does not recommend any further mitigation in this regard.

Industrial Standards

As reflected in TLS&N Table 1, there are no health-based federal regulations or industry codes specifying environmental limits on the strengths of fields from power lines. However, the federal government continues to conduct and encourage research necessary for an appropriate policy on the EMF health issue.

In the face of the present uncertainty, several states have opted for design-driven regulations ensuring that fields from new lines are generally similar to those from existing lines. Some states (Florida, Minnesota, New Jersey, New York, Montana) have set specific environmental limits on one or both fields in this regard. These limits are, however, not based on any specific health effects. Most regulatory agencies believe, as does staff, that health-based limits are inappropriate at this time. They also believe that the present knowledge of the issue does not justify any retrofit of existing lines.

Before the present health-based concern developed, measures to reduce field effects from power line operations were mostly aimed at the electric field component whose effects can manifest themselves as the previously noted radio noise, audible noise and nuisance shocks. The present focus is on the magnetic field because only it can penetrate soil, building and other materials to potentially produce the types of health impacts at the root of the present concern. As one focuses on the strong magnetic fields from the more visible overhead transmission and other high-voltage power lines, staff considers it important, for perspective, to note that an individual in a home could be exposed to much stronger fields while using some common household appliances (National Institute of Environmental Health Services and the U.S. Department of Energy, 1995). The difference between these types of field exposures is that the higher-level, appliance-related exposures are short-term, while the exposure from power lines

are lower level, but long-term. Scientists have not established which of these types of exposures would be more biologically meaningful in the individual. Staff notes such exposure differences only to show that high-level magnetic field exposures regularly occur in areas other than around high-voltage power lines.

As noted by the applicant (SFERP 2004a, pp. 5-7 and 5-8.), specific field strength-reducing measures are incorporated into power line designs in general to ensure the field strength minimization currently required by CPUC in light of the concern over EMF exposure and health.

These reduction measures may include the following:

1. Increasing the distance between the conductors and the ground;
2. Reducing the spacing between the conductors;
3. Minimizing the current in the line; and
4. Arranging current flow to maximize the cancellation effects from interacting of conductor fields.

Undergrounding achieves the close conductor placement listed above. Since this would be implemented according to PG&E's standards and practices, staff does not recommend additional mitigation before construction or mitigation-driven field strength measurements after the line is energized.

CUMULATIVE IMPACTS AND MITIGATION

Since the proposed undergrounding would yield magnetic fields of the lowest intensity possible for lines of the proposed voltage and current-carrying capacity, any contribution to cumulative area exposures would be at the lowest levels currently possible for such lines without affecting safety, reliability, efficiency, and maintainability. Staff regards the proposed impact minimization as constituting compliance with current CPUC requirements for managing the fields from new sources.

COMPLIANCE WITH LORS

As previously noted, current CPUC policy on safe EMF management requires that any high-voltage line within a given area be designed to produce fields of the lowest intensity possible without impacts on line safety, efficiency, reliability and maintainability. Since the proposed undergrounding would achieve this goal, staff considers the presented design and operational plan as complying with the health and safety LORS of concern in this analysis.

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

The proposed undergrounding of the SFERP line would produce fields of the lowest intensity possible for lines of the same voltage and current-carrying capacity. Since the

route would traverse an area without nearby residences, the field and non-field impacts of concern in this analysis would be insignificant for area residents. Such design and routing for impact minimization is in keeping with present CPUC requirements for management of fields from such lines. The line's only overhead structures would be located too far from the nearest area airport to pose an aviation hazard.

RECOMMENDATIONS

Since the proposed underground line would produce field and non-field impacts of the lowest magnitude possible without affecting line operations and safety, staff does not recommend further mitigation and recommends approval of the proposed design and operational plan. The only recommendation is for affirmation of the applicant's intention to design, operate and route it as proposed.

PROPOSED CONDITIONS OF CERTIFICATION

TLSN-1 The project owner shall provide specific evidence that the proposed interconnection transmission line will be designed and constructed by the City and County of San Francisco according to the requirements of CPUC's GO-95, GO-128, Title 8, Section 2700 et seq. of the California Code of Regulations and PG&E's EMF reduction guidelines arising from CPUC Decision 93-11-013.

Verification: At least 30 days before starting construction of transmission lines or related structures and facilities, the project owner shall submit to the Compliance Project Manager (CPM) a letter affirming that the proposed SFERP line will be constructed according to the requirements of GO-128, GO-52, Title 8, Section 2700 et seq. of the California Code of Regulations, and PG&E's EMF-reduction guidelines arising from CPUC Decision 93-11-013.

REFERENCES

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National Institute of Environmental Health Services 1998. An Assessment of the Health Effects from Exposure to Power-Line Frequency Electric and Magnetic Fields. A Working Group Report, August 1998.

SFPUC-San Francisco Public utilities Commission 2005a. Amendment A to the Application for Certification for the San Francisco Electric Reliability Project. Submitted to the California Energy Commission on March 25, 2005.

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VISUAL RESOURCES

Mark R. Hamblin

SUMMARY OF CONCLUSIONS

Energy Commission staff analyzed both the potential visual impacts of the proposed San Francisco Electric Reliability Project in accordance with the California Environmental Quality Act, and the project's compliance with applicable laws, ordinances, regulations, and standards pertaining to visual resources. Staff concludes that the proposed project would not cause significant adverse visual impacts. Effective implementation of the applicant's proposed mitigation measures and staff's recommended conditions of certification would reduce adverse visual impacts from the project to a less than significant level and ensure that the project complies with applicable laws, ordinances, regulations, and standards regarding visual resources.

INTRODUCTION

Visual resources are the natural and man-made features of the environment that can be viewed. This analysis focuses on whether construction and operation of the San Francisco Electric Reliability Project (SFERP) would cause visual impact(s) under the California Environmental Quality Act (CEQA) and whether the project would be in compliance with applicable laws, ordinances, regulations, and standards (LORS).

LAWS, ORDINANCES, REGULATIONS, AND STANDARDS

Staff has provided in **VISUAL RESOURCES Table 1** a general listing of applicable LORS that staff has evaluated to determine the proposed project's compliance. The project's consistency with specific LORS is discussed in **VISUAL RESOURCES Table 2** in this analysis.

VISUAL RESOURCES Table 1
Laws, Ordinances, Regulations, and Standards

Jurisdiction & Applicable LORS	LORS Description
Federal	The proposed project is not located on federally administered public lands and is not subject to federal regulations pertaining to visual resources.
State	There are no officially designated State Scenic Highways or Scenic Routes within the project viewshed. There are no state regulations pertaining to scenic resources applicable to the project.
Local	
City and County of San Francisco General Plan	
Recreation and Open Space Element – Shoreline (Objective 3)	- Assure that new development adjacent to the shoreline capitalizes on its unique waterfront location, considers shoreline land use provisions, improves visual and physical access to the water and conforms to urban design policies.
Urban Design Element	- The Urban Design Element is concerned both with development and with preservation. It is a concerted effort to recognize the positive attributes of the city, to enhance and conserve those attributes, and to improve the living environment where it is less than satisfactory.
Central Waterfront Area Plan - Urban Design (Objective 10)	- The overall goal of this Plan is to create a physical and economic environment conducive to the retention and expansion of San Francisco's industrial and maritime activities. The purpose of this Area Plan is to guide the future development of the Central Waterfront in a manner serving the varying needs and interests of San Francisco.
San Francisco Planning Code	
M-2 (Heavy Industrial) District	- This district is the least restricted as to use, and is located at the eastern edge of the City, separated from residential and commercial areas. The heavier industries are permitted, with fewer requirements as to screening and enclosure than in M-1 Districts, but many of these uses are permitted only as conditional uses or at a considerable distance from Residential Districts. (Amended by Ord. 443-78, App. 10/6/78)

SETTING

REGIONAL SETTING

The SFERP is proposed to be constructed in an industrial setting near the City of San Francisco's eastern waterfront. The project site consists of approximately four acres of Port of San Francisco property adjacent to the Port of San Francisco North Container Terminal. The site has a concrete batch plant on its north end that will be removed prior to development of the SFERP. The remainder of the site is vacant.

Within the project vicinity, foreground to middle-ground views (generally one mile or less) of the proposed project site are primarily limited to the upper elevations of the surrounding terrain, or to the upper floors of multi-storied buildings. Views toward the site are either open, or disrupted by the roof tops of structures.

Surrounding views from the project site include the following; to the north of the site is the Central Basin, an industrial area. The view consists of many masonry and concrete type structures. To the south are the Port of San Francisco North Container Terminal, the India Basin industrial/business park area, and Hunters Point, a prominent ridge and residential neighborhood. The existing Hunters Point Power Plant is visually prominent in this area (SECAL 2000a, AFC p. 8.11-6). To the east of the project site is the Port of San Francisco's truck terminal and beyond it the open panoramic waterscape of San Francisco Bay. To the west of the project site, along Third Street are masonry and corrugated tin industrial type rectangular structures, and scattered residential units. West of Third Street (west of Interstate-280) single-family and multi-family residential units become more prominent, with dense residential areas at higher elevations on Potrero Hill.

The Mirant owned Potrero Power Plant is approximately 1,000 feet north of the proposed project site. The Potrero Power Plant has several tall vertical structures on its site which include: a 305-foot tall exhaust stack, a 125-foot tall Unit #3 structure, the 70-foot tall masonry Station "A" complex, a 56-foot tall control room, three large fuel oil storage tanks (140 feet in diameter x 50 feet tall, 157 feet in diameter by 48 feet tall, and 167 feet in diameter by 65 feet tall); and several 80-100 foot tall steel lattice structures.

Travelers on Interstate-280 (I-280) looking towards the project site would have a disrupted view caused by various structures, including marine commerce facilities along the waterfront, and a background dramatic, panoramic view of San Francisco Bay.

PROJECT, SITE, AND VICINITY DESCRIPTION

This section describes the aspects of the proposed project that may have the potential to cause adverse impacts to visual resources. Please refer to the **PROJECT DESCRIPTON** section of the Preliminary Staff Assessment (PSA) for a more comprehensive description of the project's details.

Power Plant

The most visible components of the proposed power plant would include: three 85-foot tall exhaust stacks, three 32-foot tall (including the intake air filters) gas combustion

turbine generators (CTGs), a 32-foot tall recycled water treatment building, two 33-foot tall water storage tanks, and a 45-foot tall duplex chiller/coolant tower package.

No landscaping is proposed as part of the project. The exteriors of all project elements would be treated with a neutral gray finish that would optimize visual integration with the surrounding environment. An eight-foot high chain link fence with a dulled finish and two feet of barbed or razor wire is to be installed around the project site perimeter (SFPUC 2005a, pg. 8.11-11).

Linear Facilities

A proposed underground 115-kilovolt (kV) transmission line would directly connect the SFERP to the power grid through the PG&E Potrero Substation. The total transmission line distance is approximately 3,000 feet (SFPUC 2005a, pg. 5-2). The 115-kV transmission line route would originate from the SFERP switchyard exiting north to 25th Street, west along 25th Street, turning north to Michigan Street. The line will intersect Illinois Street and continue north to the Potrero Switchyard. It is expected the only aboveground structures will be four steel transmission structures; two structures within the new SFERP switchyard to be located on the north end of the project site, and two structures within the Potrero Substation. The steel structures will be approximately 8 feet tall (SFPUC 2005a, pg. 8-11-11). Installed around the perimeter of the site will be an 8-foot-high chained link fence with and additional 2 feet of barbed razor wire to keep people away from the site.

PG&E is currently performing a Facilities Study to evaluate the feasibility of two alternatives to route the transmission line from Illinois Street to the Potrero switchyard. The two alternatives are to (1) enter the Potrero switchyard underground from Illinois Street or (2) continue north to 22nd Street and enter the switchyard from 22nd Street. If the 22nd Street route is selected, the circuits would then run east in 22nd Street to an underground/overhead transition structure located on the eastern portion of the switchyard. An overhead line would then connect with the switchyard in an overhead arrangement (SFPUC 2005a, pg. 5-2).

Natural gas for the facility is to be supplied by a new underground 900-foot, 12-inch diameter pipeline that is to connect to PG&E's line 101.

The City of San Francisco is to supply process water to the SFERP for cooling purposes by means of a proposed 4,000-foot (approximate) underground pipeline.

Potable water is to be supplied to the power plant by a proposed 300-foot underground pipeline that will connect to an existing water main in Cesar Chavez Street.

Construction Laydown Area

An 8.5-acre construction laydown area is to be located on Port of San Francisco property along the east side of the project site. The laydown area will be approximately 125 feet south of Warm Water Cove. The laydown area will use land that is undeveloped, graded and relatively flat. The site is currently being used to park truck trailers.

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

Please refer to **Appendix VR-1** for a complete description of staff's Visual Resources evaluation process.

DIRECT/INDIRECT IMPACTS AND MITIGATION

The following discussion of project impacts is organized around the four questions found in the CEQA Guidelines Appendix G Environmental Checklist Form pertaining to Aesthetics.

Scenic Vistas

The first checklist question; "Would the project have a substantial adverse effect on a scenic vista?"

The project site is within the boundary of the City of San Francisco's Central Waterfront Area Plan. The Plan does not identify any scenic vistas within the project view shed.

The nearest public access to an unobstructed view of San Francisco Bay in the vicinity of the project is Warm Water Cove Park. The public park is north of the project site. The Bay is east of the park. The SFERP would not visually obstruct the view of San Francisco Bay from the park.

Potrero Hill is considered a vista point. Views from it would be slightly affected. The additional visual contrast, and view blockage caused by new power plant structures is expected to be low.

The view of the project site from Key Observation Point (KOP) 1 on Watchman Way on Potrero Hill (**VISUAL RESOURCES- Figure 2**) will be disrupted by the construction of San Francisco Municipal Railway's Metro East Light Rail Maintenance and Operations Facility on the 13 acres to the west of the project site (between Potrero Hill and the power plant site). The light rail facility was tentatively scheduled to start construction in summer 2005 with completion in spring 2008.

The new power plant would appear small when compared to other features in the view, and in particular the Metro East Light Rail Maintenance and Operations Facility with its approximate 40-foot tall, 180,000 square foot main building (**VISUAL RESOURCES – Figure 3**). The proposed project would not have a substantial adverse effect on a scenic vista, and would cause a less than significant visual affect.

Scenic Resources

The second checklist question; "Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway corridor?"

A publicly accessible area that provides a scenic view of San Francisco Bay in the vicinity of the project site is Warm Water Cove Park. The park is surrounded on three sides by industrial type structures.

Views from Warm Water Cove Park to the project site (south) are screened by the Sheedy Drayage Company. An eight-foot tall solid (plywood) fence with razor wire on the perimeter of the Sheedy property adjoins the park. The fence is covered with graffiti. Views toward the project site from the park are disrupted or blocked by a graffiti-covered wall and a 30-40 foot-tall (approximately) large old warehouse on the Sheedy property. Further in the distance, on the project site protruding about 20 feet above the top of the Sheedy warehouse, the top of the concrete batch plant equipment is visible. This equipment would be removed prior to construction of the power plant.

The Sheedy Drayage Company provides crane, rigging, and heavy hauling services. The company operates a fleet of more than 100 trucks, trailers, and cranes (including tower cranes and man lifts). This equipment and other heavy-duty lifting and hauling equipment are stored on the Sheedy property.

From Warm Water Cove Park, a small portion of the top of the proposed three 85-foot tall exhaust stacks for the SFERP would be visible above the Sheedy warehouse. The exhaust stacks would be about 600 feet south of the warehouse. The top portion of the stacks would introduce prominent linear, regular geometric forms with strong vertical lines to the southern view from Warm Water Cove Park. The potential view of the stacks would generate a less than significant visual impact in the context of the existing industrial character of the area, and the on-going heavy equipment storage bordering the park.

The portion of I-280 within the project viewshed is not listed as a state designated California Scenic Route or a California Scenic Highway.

SFERP is not within the Pier 70 or Dogpatch historic district boundaries. Views of SFERP structures from these historic districts are substantially disrupted by large industrial buildings in the area. The proposed project would cause low visual contrast and low view disruption when viewed from the historic districts. The visual change would not cause a significant visual impact.

Visual Character or Quality

The third CEQA checklist question: "Would the project substantially degrade the existing visual character or quality of the site and its surroundings?" The project aspects that were evaluated under this criterion include project construction, the power plant and transmission transition structure, the various pipelines, and visible water vapor plumes.

Project Construction

Construction of the power plant from site preparation and grading to commercial operation is expected to take approximately 12 months (SFPUC 2005a, pg. 1-4). The constructing of the SFERP structures would appear subordinate within the existing urban/industrial features, and the panoramic background landscape of San Francisco Bay. The project would appear quite small in the wide field of view.

On the project site during the construction period, views of a tall crane(s) and other heavy equipment, building materials, piles of debris, et cetera are expected. From KOP 1, equipment, materials, and workforce vehicles on the project site would generate a less than significant visual distraction due to the viewing angle, and other on-going industrial and maritime support activities in the area.

Nighttime construction is not expected to take place. In the unlikely event that nighttime construction does occur, the applicant would take measures to minimize the off-site visibility of lighting. These measures would include using the minimal lighting required for operations and safety, and using lighting that is shielded and highly directional. The mitigation measures proposed by the applicant and the effective implementation of proposed condition of certification **VIS-1** would ensure that construction lighting impacts, if they occur, are kept to less than significant levels.

The proposed site for the SFERP is surrounded on all sides by industrial activity and structures. There are a few residences with partial views of the site within ½-mile of the proposed site. Residences on the east side of Potrero Hill, represented by KOP 1, have nearly full views of the site from greater than ½-mile away. These residences have elevated panoramic views of the industrial area and San Francisco Bay (see Visual Resources Figure 2 and 3, views from KOP 1), and viewers are accustomed to seeing industrial uses on a regular basis.

Construction screening is typically accomplished by attaching a fabric or adding wooden slats to the perimeter fence. This screening would provide little to no visual benefit to residential viewers of the proposed SFERP site or laydown area. Due to the distance and angle of view of the proposed site from KOP 1, and other factors described above, a condition to require construction activity screening has not been proposed by staff.

Linear Facilities

Construction of the underground electric transmission line, the natural gas pipeline and the potable and process water pipelines will result in a noticeable visual disruption along several public streets for 1-4 months; as a result of construction activities, equipment, excavated piles of dirt, concrete and asphalt pavement, construction personnel and vehicles.

The electric transmission line distance from the SFERP switchyard to the connection at the Potrero Substation is approximately 3,000 feet. The proposed transmission lines will be installed underground. It is expected that the aboveground structures will consist of two steel transmission structures within the proposed SFERP switchyard, and two structures within the existing Potrero Substation. The steel structures will be approximately 8 feet tall (SFPUC 2005a, pg. 8-11-11). The proposed new underground electric transmission line and the four steel structures would not generate a significant visual impact.

The proposed underground natural gas, waste water and potable water pipelines would have no visual impact.

The ground surface areas affected by the various underground linear facilities are to be cleaned-up, repaired and restored to the pre-construction condition by the applicant. To ensure the restoration of the ground surface as a result of linear construction activities, staff has proposed condition of certification **VIS-2**. With the implementation of **VIS-2**, the visibility of the project's linear construction activities would generate a less than significant visual effect.

Construction Laydown Area

The applicant has offered to restore the laydown area to its previous use as a parking area upon completion of the construction of the power plant (SFPUC 2005a, pg. 8.11-17).

Staff has proposed condition of certification **VIS-2** to require the removal and restoration of the laydown area upon the completion of the SFERP. With the effective implementation of **VIS-2** the project laydown area would generate a less than significant visual effect.

Power Plant and Structures

The SFERP site is surrounded by various sized industrial buildings and structures that would limit visibility of the project site. To the north of the site are the Sheedy Drayage Company and the Potrero Power Plant. To the south are the Port of San Francisco North Container Terminal, Penske Truck Rental, and other industrial buildings that front Cesar Chavez Street. To the east is the Port of San Francisco's trailer parking area and San Francisco Bay. To the west is the construction laydown area.

Staff uses Key Observation Points[1], or KOPs, as representative locations from which to conduct detailed analyses of the proposed project and to obtain existing condition photographs and prepare visual simulations. KOPs are selected to be representative of the most critical locations from which the project would be seen. However, KOPs are not the only locations that staff considered in each view area.

Although the proposed project would be visible from several areas near the project site, one KOP has been chosen for analysis of the proposed SFERP. The KOP represents a viewpoint of the project site from a location on Potrero Hill on Watchman Way. Staff visited the KOP selected by the applicant, and other locations in the project's vicinity. Staff believes the KOP selected and presented in the Application For Certification Supplement A (SFPUC 2005a) visual section is appropriate for this analysis.

VISUAL RESOURCES - Figure 1 (photo locations) shows locations from which the project would be visible (project viewshed), and the location and view direction of the KOP selected to represent a sensitive viewing area most impacted by the proposed project. All visual resources figures are presented at the end of this analysis. Figure 1 shows the location of the selected KOP, and the landscape character (LC) photos. KOP 1 presents a view looking east from Watchman Way towards the proposed SFERP site.

[1] The use of KOPs or similar view locations is common in visual resource analysis. The U.S. Bureau of Land Management (USDI BLM 1986a, 1986b, 1984) and the U.S. Forest Service (USDA Forest Service 1995) use such an approach.

KOP 1 - Watchman Way

VISUAL RESOURCES - Figure 2 presents a view from an urban high density developed residential area near the middle part of Potrero Hill, approximately 0.6-mile from the proposed SFERP site. The view is dominated in the foreground with numerous urban industrial and marine commerce uses that have vertical and geometric block form structures and the expanse of San Francisco Bay.

The view shows diverse textured patterns within a dense urban industrial and marine commerce area that includes a variety of prominent vertical structures such as: a portion of elevated concrete piered I-280, the Port of San Francisco North Container Terminal and its ten 130-147-foot cranes. The Port of San Francisco's Pier 80 170,000 and 294,000-square foot covered storage facilities are large horizontal structural forms adjacent to the project site.

Residents, pedestrians, and motorists would have partial foreground and middle ground views of the proposed project for an estimated 6-to-9 month period. During this time period, the potentially visible aspects of the power plant structures at KOP 1 would be the 115-kV switchyard, the three combustion turbine generators and exhaust stacks, the duplex chiller/coolant tower package, the 12-foot tall sound wall for the gas compressor station, the water treatment building, and the top portion of the plant service building.

The project introduces structures that are visually smaller and less massive when compared to other structures in the view. In addition the proposed project structures would replace the visual disturbance currently generated by the concrete batch plant operating on the project site. The concrete plant is at the approximate location of the proposed SFERP's switchyard.

It should be noted that San Francisco Municipal Railway's Metro East Light Rail Maintenance and Operations Facility is to be constructed on the 13 acres to the west of the power plant site fronting on Illinois Street (between Potrero Hill and the power plant site). The new facility includes a maintenance building, paint and body shop, and an outdoor storage yard with a capacity for about 80 light rail cars. The facility's main shop and administration building will be approximately 40 feet tall, and about 180,000 square feet. The tentative start of construction on the facility was summer 2005 with completion in spring 2008. The facility's aesthetic design review is to be conducted by the Port of San Francisco. The San Francisco Art Commission is to conduct the color, materials, and public art review for the facility (San Francisco Municipal Railway, Third Street Light Rail Project Rail Project. http://www.sfmuni.com/aboutmun/3rdmaint.htm).

The construction of the power plant is estimated to be completed 6-9 months prior to the completion of the new light rail maintenance and operations facility. During construction and at completion, the light rail maintenance and operations facility would provide some degree of visual screening of the power plant. The visible aspects of the power plant structures with the constructed light rail facility from the KOP would consist of the top portion of the three exhaust stacks, the top of the duplex chiller/coolant tower package, and the roof of the corrugated tin recycled water treatment building (see **VISUAL RESOURCES – Figure 3**).

Visual Sensitivity

From KOP 1, project site visibility would be from an elevated perspective that is unobstructed at a middle ground viewing distance. Site visibility from I-280 would consist of disrupted views over roof tops.

A high number of viewers travel on I-280. The Caltrans traffic count in 2004 at the intersection of I-280 and Army Street/Cesar Chavez Street had a peak month north bound travel lane vehicle count of 94,000 vehicles, and a south bound travel lane count of 116,000 vehicles.[2] A vehicle traveling between Cesar Chavez and 25th Street would travel through the project viewshed in 10 seconds or less under normal driving situations.

From KOP 1, residents would generally anticipate open, frontal views of an existing highly urbanized, industrial waterfront landscape; however, new industrial features that would further detract from the panoramic views of San Francisco Bay and East Bay Hills may be perceived as detracting from the available vista.

The panoramic view of the waterfront backdropped by San Francisco Bay and the East Bay Hills offers a diverse landscape with increased visual interest that partially offsets the lower quality of the shoreline industrial development. The contrasting lighter structural colors and blues of the Bay and sky also add variety and interest. Visual quality is moderate, reflecting the balance between a prominent urban/industrial landscape and a panoramic background of predominantly natural features of the Bay. Therefore, viewer concern is moderate.

Visual Change

The visual landscape from KOP 1 is comprised in the foreground of commercial buildings, transportation infrastructure (e.g., I-280), and industrial features that all compete with the picturesque backdrop of San Francisco Bay and the East Bay Hills for the viewer's attention.

From KOP 1, a view of San Francisco Bay (higher quality landscape feature) is already disrupted by I-280 and Port of San Francisco structures. View disruption would be low.

Proposed power plant structures would not be prominent in the KOP view. The proposed project structures would replace the visual disturbance currently generated by the concrete batch plant operating on the project site. The structures would appear subordinate within the mosaic of urban/industrial features and the panoramic background landscape. In addition the project would appear small in size in the wide field of view. Project dominance is rated low.

The project would introduce vertical structural lines and linear forms, specifically three turbine combustion generators and stacks. The introduced forms and lines would be consistent with forms and lines already established by other structures in the vicinity (e.g. Port of San Francisco's ten 130+ foot tall cranes).

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[2] Caltrans, 2004 Traffic and Vehicle Data Systems Unit website: http://traffic-counts.dot.ca.gov/

The introduction of neutral gray colored project structures into the view would present a minor color contrast with the darker blue colors of San Francisco Bay, the green to brown colors of the East Bay Hills, and the varied coloration of the existing urban/industrial area. Overall, visual contrast with the existing setting would be low.

From KOP 1, the overall visual change caused by the proposed project would be low due to the low visual contrast, low dominance and low degree of view disruption and blockage of the higher quality landscape feature of San Francisco Bay.

When considered within the context of a moderate visual sensitivity of the existing landscape and viewing characteristics, and the low visual change that would be perceived from KOP 1, the project would not cause a significant adverse visual impact. To ensure that SFERP structures are painted in a neutral gray color as proposed and analyzed, staff has proposed condition of certification **VIS-3**.

Impact of Cooling Tower and Combustion Exhaust Stack Plumes

The proposed SFERP is a simple-cycle power plant that would include three 85-foot tall combustion exhaust stacks and a 45-foot tall two-cell chiller/cooling tower package. The applicant has not proposed to use any abatement technology for visible plumes. Staff completed a visible plume modeling analysis of the potential unabated cooling tower and gas turbine exhaust stack plumes for the project utilizing design parameters provided by the applicant (Walters and Blewitt, 2004)[3]. Please refer to **Appendix VR-2** at the end of this visual resources section for a more complete description of staff's Visible Plume Modeling Analysis.

Staff modeled the estimated turbine plume frequency and dimensions for the cooling tower and turbine exhausts using the Combustion Stack Visible Plume (CSVP) model, and a six-year (1990-1995) meteorological data set obtained from the National Climatic Data Center from San Francisco International Airport.

No combustion exhaust stack water vapor plumes are predicted to occur under full load or 50 percent load conditions during the operation of the SFERP. The SFERP's combustion exhaust will be at such a high temperature (744 to 826 degrees Fahrenheit) that little or no visible water vapor plumes would be expected to form above the exhaust stacks under any combination of operating and ambient conditions.

To ensure that the visual impacts of cooling tower plumes will remain less than significant, staff has proposed condition of certification **VIS-6** to verify the cooling tower design parameters.

Light or Glare

The fourth CEQA checklist question asks; "Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?"

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[3] "The applicant confirms that the cooling tower operating assumption values presented in the applicant's previous visible plume modeling data response(s) and found in Informal Data Response Set 1A, (Docket 04-AFC-1dated August 2, 2004) are still valid for the project as currently proposed" (Source San Francisco Electric Reliability Project Supplement A Data Response, Set 3A dated June 3, 2005).

General sources of night lighting in the KOP 1 view include street and vehicle lights, and area and perimeter lighting of existing commercial, industrial, and maritime operations for safety and security reasons. Specific examples of night time light generators include: the Port of San Francisco North Container Terminal, the Potrero Power Plant, and vehicle lights on I-280. In addition, the Potrero Power Plant maintains flashing red lights (aviation safety lights) on its Unit #3 exhaust stack.

Many of the lights in the area are unshielded or take place in clusters. Existing visible night lighting ranges from a soft amber color to an intense white light. Vehicle head lights and tail lights on I-280 are a prominent source of light and appear as horizontal bright, solid orange and red bands.

The proposed project's night lighting would be most visible from KOP 1. This KOP would have an elevated and mostly unobstructed view of the project's potential night time lighting.

Although the proposed power plant is a peaking unit, it could be operated 24 hours per day, 7 days per week for periods of time. Its operation would require onsite nighttime lighting for safety and security (SFPUC 2005a, pg. 8-11-16). The project would add ambient light to the existing nighttime landscape. If project lighting were uncontrolled, the resultant direct light trespass and uplighting to the nighttime sky could cause a significant adverse visual impact on sensitive visual receptors, such as residences on Potrero Hill.

The applicant has proposed to install lights that are shielded and directed downward, and to install separate switches for the lights on the tallest structures, such as the exhaust stacks, so they could remain turned off except during maintenance activities. The added lighting generated by the proposed project is not expected to significantly change ambient lighting conditions as viewed from KOP 1. In addition, the completion of the San Francisco Municipal Railway light rail facility may significantly block potential off-site light generated by the power plant towards Potrero Hill.

Staff proposes condition of certification **VIS-4** to require review and approval of a lighting plan for the project by Energy Commission staff to ensure that the measures proposed by the SFERP are properly implemented. With the applicant's commitment to minimize offsite light emissions, the SFERP would not generate a substantial new source of light that could adversely affect nighttime views.

The applicant is proposing to utilize a surface treatment for major project structures and fixtures in the public view that will limit glare. Staff proposes condition of certification **VIS-3**, which would require review and approval by Energy Commission staff of a surface treatment plan for the project structures. With the effective implementation of the mitigation measures proposed by the applicant and condition **VIS-3**, the SFERP would not be a source of substantial glare that could adversely affect daytime views.

The applicant may install one freestanding sign at the gated entrance to the SFERP site. The sign is to use non-glare materials, and unobtrusive colors in accordance with the San Francisco Planning Code. The design of any signs required by safety

regulations will need to conform to the criteria established by those regulations. To ensure that project signage will be in conformance with the City and County of San Francisco's regulations staff has proposed condition of certification **VIS-5**.

CUMULATIVE IMPACTS AND MITIGATION

As defined in Section 15355 of the CEQA Guidelines (California Code Regulation, Title 14), a cumulative impact is created as a result of the combination of the project under consideration together with other existing or reasonably foreseeable projects causing related impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. In other words, though any one project in a given area may not create a significant impact to visual resources, the combination of the new project with all existing or planned projects in the area may create significant impacts. The significance of the cumulative impact would depend on the degree to which (1) the viewshed is altered; (2) visual access to scenic resources is impaired; or (3) visual quality is diminished.

The City's intention as presented in numerous land use plans is to fully develop the shoreline within the Central Waterfront Area.

An undeveloped 13-acre property west of to the project site and bounded by 25th Street, Illinois Street and Cesar Chavez Street is to be used for the construction of San Francisco Municipal Railway's Metro East Light Rail Maintenance and Operations Facility. The new facility will provide for the storage, maintenance and operation of about 80 light rail vehicles to be used on the new Third Street Light Rail Line. The light rail maintenance facility will have a main shop/administration building that is approximately 40 feet tall and 180,000 square feet. The start of construction for the facility was tentatively scheduled to begin in the summer 2005 with completion of the project in spring 2008.

A multi-modal bridge is to be constructed over Islais Creek (south of the project site). The bridge will link Illinois Street to Cargo Way and provide access for rail, truck traffic, and bicyclists. Construction is to start in March 2005 and last 18 months. Two concrete batch plants are to be constructed on the south side of Islais Creek on Piers 92 and 94. Both plants are to be operational by summer 2005.

Planned projects within the Central Waterfront Area include a mixed-use development at Pier 70, the building of 1,500 housing units, and a large development involving 600 acres in Mission Bay (north of the project site). This development would include commercial, residential, and industrial uses. A 44- acre area involving Piers 90-94 is in the initial planning phase for a distribution and warehouse complex.

From KOP 1, the SFERP's impact to visual resources, when combined with the existing cumulative impact of other projects described above would remain subordinate within the industrial waterfront and the panoramic background landscape, and would not be cumulatively considerable. The project does not result in a significant cumulative impact to visual resources.

COMPLIANCE WITH LORS

The proposed power plant and associated linear facilities would be constructed within the jurisdiction of the City and County of San Francisco. Therefore, the SFERP would be subject to LORS pertaining to the protection and maintenance of visual resources which are found in the City and County of San Francisco's General Plan and Municipal Code. Specifically, the City's General Plan contains two applicable elements for review: the Recreation and Open Space Element, and the Urban Design Element. The General Plan also includes the Central Waterfront Area Plan which provides more specific development policies for the area where the proposed project site is located. The San Francisco Planning Code provides applicable zoning provisions for development on the project site.

VISUAL RESOURCES Table 2 provides a consistency review discussion of the project with applicable local LORS.

Protocol: **VISUAL RESOURCES Table 2**
Protocol: **Proposed Project's Consistency with**
Protocol: **Applicable Local LORS Specific To Visual Resources**

Protocol: **City and County of San Francisco** Protocol: **General Plan - Recreation and Open Space**	
Protocol:	**Provision** Policy 3.1 - Assure that new development adjacent to the shoreline capitalizes on its unique waterfront location, considers shoreline land use provisions, improves visual and physical access to the water and conforms to urban design policies.
Protocol:	**Consistency** **Consistent**. The proposed project is a use appropriately located within the heavy industrial zone (M-2 Zone District). The proposed project is to be constructed in a location that already has limited visual and physical access to San Francisco Bay as a result of existing industrial and marine commerce uses. The proposed project site is to be located on Port of San Francisco property, approximately 225 feet from nearest shoreline (Warm Water Cove). The visual and physical access of San Francisco Bay from the project site is already disrupted by the Port of San Francisco North Container Terminal structures. In addition, the proposed project will replace a currently operating concrete batch plant on the project site.
Protocol: **City and County of San Francisco** Protocol: **General Plan – Urban Design**	
Protocol:	**Provision** Policy 1.1 – Recognize and protect major views in the city, with particular attention to those of open space and water.
Protocol:	**Consistency** **Consistent**. The project introduces new structure(s) to the Central Waterfront area. The proposed project is to be constructed in a location that already has limited visual and physical access to San Francisco Bay as a result of industrial and marine commerce uses. The view of San Francisco Bay from KOP 1 is already disrupted (without the project) by the Port of San Francisco North Container Terminal structures and its activities (periodic loading and unloading of ships). The project provides a more ordered development of Port of San Francisco property in the Central Waterfront Area Plan. The project will replace an operating concrete batch plant on the site.
Protocol:	**Provision** Policy 1.3 – Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts.

Protocol:	**Consistency** **Consistent.** The project introduces new structure(s) to the Central Waterfront area. The project's design, surface and architectural treatment would not contrast visually with existing industrial and maritime commerce structures in the vicinity of the project site.
Protocol:	**Provision** Policy 2.6 - Respect the character of older development nearby in the design of new buildings. Protocol: Policy 3.1 - Promote harmony in the visual relationships and transitions between new and older buildings. Protocol: Policy 3.2 - Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance. Protocol: Policy 3.3 – Promote efforts to achieve high quality of design for buildings to be constructed at prominent locations.
Protocol:	**Consistency** **Consistent.** The proposed project design would respect the visual characteristics of existing development in the vicinity of the project site. The SFERP site is surrounded by various designed industrial and marine commerce structures. To the north of the site are the Sheedy Drayage Company, and the Potrero Power Plant. To the south are the Port of San Francisco North Container Terminal, Penske Truck Rental, and a line of industrial buildings that front Cesar Chavez Street. To the east is the Port of San Francisco's trailer parking area and San Francisco Bay. Protocol: Protocol: The project's design, surface and architectural treatment would not contrast visually with the existing industrial and maritime commerce structures in the vicinity of the project site. Protocol: Protocol: The project introduces new industrial structure(s) to the Central Waterfront area. The color proposed for project structures would be neutral gray. The project's structures would introduce minor color contrast with the darker blue colors of San Francisco Bay, and the green to brown colors of the East Bay Hills, and blend with the varied coloration and diverse pattern of the existing dense urban industrial and waterfront setting.
Protocol:	**Provision** Policy 3.4 – Promote building forms that will respect and improve the integrity of open spaces and other public areas.
Protocol:	**Consistency** **Consistent**. The proposed project is a use appropriately located within the heavy industrial zone (M-2 Zone District). The proposed project is to be constructed in a location that already has limited visual and physical access to San Francisco Bay as a result of long-time existing industrial and marine commerce uses. Protocol: Warm Water Cove Park is the closest public area to the project. Warm Water Cove Park is a public park located north of the SFERP site. Proposed project's structures are not of a height or mass that would visually distract from the integrity of the park. The power plant's exhaust stacks (power generation block) are approximately 500-550 feet from Warm Water Cove Park. The proposed project does not disrupt the view from the park of San Francisco Bay and the East Bay Hills.
Protocol:	**Provision** Policy 3.5 - Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development. Protocol: Policy 3.6 - Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.

Protocol:	**Consistency** **Consistent.** The heights of existing development within this dense urban industrial and marine commerce area includes: the Potrero Power Plant 305-foot tall exhaust stack, and the Port of San Francisco North Container Terminal masonry structures and its ten steel 130-147-foot cranes. Protocol: The City's Urban Design Guidelines outline height and bulk requirements. The City's heavy industrial ("M") zone district's height and bulk limits: 100 feet (height) x 250 feet (length) x 300 feet (diagonal dimension). The proposed project's tallest structures are its three 85-foot tall exhaust stacks. The project's tallest building is the 32-foot tall recycle water treatment building. The exhaust stacks and the recycled water treatment building would not exceed the height or bulk dimensions. The proposed power plant would not be visually overwhelming, nor dominate in the existing industrial waterfront landscape.
	Protocol: **City and County of San Francisco** Protocol: **General Plan – Central Waterfront Area Plan**
Protocol:	**Provision** Policy 10.1 – Reinforce the visual contrast between the waterfront and hills by limiting the height of structures near the shoreline. Relate the height and bulk of new structures away from the shoreline to the character of the topography and existing development.
Protocol:	**Consistency** **Consistent.** The City's Urban Design Guidelines outline height requirements. The City's heavy industrial ("M") zone district's height limit is 100 feet. The SFERP's tallest structures would be its three 85-foot tall exhaust stacks. The power generation block, which includes the exhaust stacks, is approximately 500-550 feet from the Warm Water Cove shoreline. The project site's "line of sight" to San Francisco Bay is already disrupted by the Port of San Francisco and its ten 130+ foot tall cranes used to load and unload container ships. The height of the proposed project structures when compared to the Port of San Francisco structures would not visually contrast between the waterfront and hills at the proposed project location.
Protocol:	**Provision** Policy 10.2 - Protect and create views of the downtown skyline and the San Francisco Bay. Design and locate new development to minimize obstruction of existing views.
Protocol:	**Consistency** **Consistent.** The overall goal of the Central Waterfront Area Plan is to create a physical and economic environment conducive to the retention and expansion of San Francisco's industrial and maritime activities. As a result, the view towards downtown San Francisco (north of the project site) is already obstructed by existing tall industrial structures; such as the Potrero Power Plant's Unit #3, its 305-foot tall exhaust stack, the deteriorating 70-foot tall Station "A" complex building, and its three 50-65 foot-tall concrete fuel tanks, and the numerous structures in the former Bethlehem Steel Shipyard on the north side of the Potrero Power Plant.
Protocol:	**Provision** Policy 18.1 – Minimize blockage of private and public views and maintain, to the extent feasible, sightlines from Potrero Hill and Mission Bay to the waterfront and downtown.
Protocol:	**Consistency** **Consistent**. The view of San Francisco Bay is already disrupted by the Port of San Francisco's Pier 80 cargo terminal structures, and the periodic loading and unloading of a container ship. The proposed project would replace a small visually unattractive concrete batch plant.
Protocol:	Protocol: Project structures would be much smaller in size than those already established in the immediate vicinity by other structures, including the Port of San Francisco's Pier 80, Piers 94 and 96, ten 130-foot plus tall cranes, and the Potrero Power Plant Unit #3 305-foot tall exhaust stack.

Protocol: City and County of San Francisco Protocol: Planning Code	
Protocol:	**Provision** Section 210.6 – The M-2 (Heavy Industrial) districts are the least restricted as to use and are located at the eastern edge of the City, separated from residential and commercial areas. The heavier industries are permitted, with fewer requirements as to screening and enclosure than in M-1 (Light Industrial) districts, but some uses are permitted only as a conditional use or at some distance from residential districts. Protocol: Protocol: Section 226 - Manufacturing and Processing Protocol: Permitted use - (p) Steam Power Plant.
Protocol:	**Consistency** **Consistent**. The project site is within the M-2 Zone District. The proposed project is an electric power generation plant. Power plants are an allowed use within the M-2 Zone District.[4]
Protocol:	**Provision** Section 270 – Bulk Limits: Measurement - "M" District Protocol: height maximum dimension – 100 feet Protocol: maximum plan dimensions – 250 feet length; 300 feet diagonal dimension
Protocol:	**Consistency** **Consistent**. The project's tallest structures are its three 85-foot exhaust stacks. The project's tallest building is the waste and recycled water treatment building which is 32 feet tall (approximately). The length of the longest building on the site, the plant service building is approximately 200 feet.
Protocol:	**Provision** Section 607 – Business Sign Protocol: A sign which directs attention to a business, commodity, service, industry or other activity which is sold, offered, or conducted, other than incidentally, on the premises upon which such sign is located, or to which it is affixed.
Protocol:	**Consistency** **Consistent**. The applicant is proposing to install one non-illuminated sign at the main entrance gate to the power plant that would state the name of facility.

RESPONSE TO AGENCY AND PUBLIC COMMENTS

No agency or public comments pertaining to visual resources have been received as of the preparation of this Preliminary Staff Assessment section.

CONCLUSIONS

The visual analysis focused on two main issues; (1) does the construction and operation of the project cause visual impacts; and (2) would the project be in compliance with applicable local LORS.

The project site is within the boundary of the City of San Francisco's Central Waterfront Area Plan. The overall goal of this Plan is to create a physical and

[4] Permitted uses include steam power plants. Because the Planning Code specifically cites steam power plants as a permitted use but does not identify any other type of power plant as being permitted, staff requested a determination from the City and County of San Francisco's Zoning Administrator during the processing of the Potrero Power Plant Unit 7 application as to whether a combined cycle gas-fired power plant would be considered a permitted use in the M-2 zoning district. In a letter dated August 8, 2001, the Zoning Administrator determined that the type of power plant proposed by the applicant was permitted in the M-2 district, and other types of power plants would also be permitted because the "steam" reference is outdated and the Code section had not been updated.

economic environment conducive to the retention and expansion of San Francisco's industrial and maritime activities. The Central Waterfront Area Plan does not specifically identify a scenic vista within the project's viewshed from KOP 1.

- The project site is within the City's M-2 (Heavy Industrial) Zone District.
- The Caltrans California Scenic Highway System listing of scenic highways does not identify the portion of I-280 within the view of KOP 1 or the proposed SFERP site as being within a State designated scenic highway corridor.
- The proposed SFERP would be consistent with applicable visual policies of the City and County of San Francisco General Plan, Recreation and Open Space Element, Urban Design Element, and the Central Waterfront Area Plan.
- The proposed SFERP site is not within a City/County designated historic district.
- The proposed project would not cause significant visual impacts on a minority population; there would be no environmental justice issues pertaining to visual resources.
- With mitigation, construction and operation of the SFERP will not cause any significant visual impacts to adjacent land uses, nor would the operation of the SFERP contribute considerably to any cumulative visual impacts.

The construction and operation of the SFERP as proposed, with the effective implementation of the staff recommended conditions of certification below, would reduce adverse visual impacts from the project to a less than significant level and ensure that the project complies with all applicable LORS regarding visual resources.

PROPOSED CONDITIONS OF CERTIFICATION

CONSTRUCTION LIGHTING

VIS-1 The project owner shall ensure that lighting for construction of the power plant is used in a manner that minimizes potential night lighting impacts, as follows:

A. All lighting shall be of minimum necessary brightness consistent with worker safety and security;

B. All fixed position lighting shall be shielded/hooded, and directed downward and toward the area to be illuminated to prevent direct illumination of the night sky and direct light trespass (direct light extending outside the boundaries of the power plant site or the site of construction of ancillary facilities, including any security related boundaries); and

C. Wherever feasible and safe and not needed for security, lighting shall be kept off when not in use.

Verification: Within seven days after the first use of construction lighting, the project owner shall notify the CPM that the lighting is ready for inspection. If the CPM requires modifications to the lighting, within 15 days of receiving that notification the project owner shall implement the necessary modifications and notify the CPM that the modifications have been completed.

Within 48 hours of receiving a lighting complaint, the project owner shall provide the CPM with a complaint resolution form report as specified in the General Conditions section including a proposal to resolve the complaint, and a schedule for implementation. The project owner shall notify the CPM within 48 hours after completing implementation of the proposal. A copy of the complaint resolution form report shall be included in the subsequent Monthly Compliance Report following complaint resolution.

SITE SURFACE RESTORATION

VIS-2 The project owner shall remove all evidence of the laydown area and linear facility construction activities, and shall restore the ground surface to the original condition or better condition, including the replacement of any vegetation or paving removed during construction where project development does not preclude this. The project owner shall submit to the CPM for review and approval a surface restoration plan the proper implementation of which will satisfy these requirements.

Verification: At least 60 days prior to the start of commercial operation, the project owner shall submit the surface restoration plan to the CPM for review and approval.

If the CPM notifies the project owner that any revisions of the surface restoration plan are needed, within 30 days of receiving that notification the project owner shall submit to the CPM a plan with the specified revisions.

The project owner shall complete surface restoration within 60 days after the start of commercial operation. The project owner shall notify the CPM within seven days after completion of surface restoration that the restoration is ready for inspection.

SURFACE TREATMENT OF PROJECT STRUCTURES AND BUILDINGS

VIS-3 The project owner shall treat the surfaces of all project structures and buildings visible to the public such that a) their color(s) minimize(s) visual intrusion and contrast by blending with the landscape; b) their colors and finishes do not create excessive glare; and c) their colors and finishes are consistent with local policies and ordinances. The transmission line conductors shall be non-specular and non-reflective, and the insulators shall be non-reflective and non-refractive.

The project owner shall submit for CPM review and approval, a specific surface treatment plan that will satisfy these requirements. The treatment plan shall include:

A. A description of the overall rationale for the proposed surface treatment, including the selection of the proposed color(s) and finishes;

B. A list of each major project structure, building, tank, pipe, and wall; the transmission line towers and/or poles; and fencing, specifying the color(s) and finish proposed for each. Colors must be identified by vendor, name, and number; or according to a universal designation system;

C. One set of color brochures or color chips showing each proposed color and finish;

D. One set of 11" x 17" color photo simulations at life size scale, of the treatmen proposed for use on project structures, including structures treated during manufacture, from Key Observation Point 1;

E. A specific schedule for completion of the treatment; and

F. A procedure to ensure proper treatment maintenance for the life of the project.

The project owner shall not specify to the vendors the treatment of any buildings or structures treated during manufacture, or perform the final treatment on any buildings or structures treated in the field, until the project owner receives notification of approval of the treatment plan by the CPM. Subsequent modifications to the treatment plan are prohibited without CPM approval.

Verification: At least 90 days prior to specifying to the vendor the color(s) and finish(es) of the first structures or buildings that are surface treated during manufacture, the project owner shall submit the proposed treatment plan to the CPM for review and approval and simultaneously to the City and County of San Francisco Planning Department for review and comment. The Planning Department shall provide the CPM with documents 45 days prior to the estimated date of providing paint specification to vendors.

If the CPM determines that the plan requires revision, the project owner shall provide to the CPM a plan with the specified revision(s) for review and approval by the CPM before any treatment is applied. Any modifications to the treatment plan must be submitted to the CPM for review and approval.

Within ninety (90) days after the start of commercial operation, the project owner shall notify the CPM that surface treatment of all listed structures and buildings has been completed and they are ready for inspection and shall submit one set of electronic color photographs from the same key observation points identified in (d) above.

The project owner shall provide a status report regarding surface treatment maintenance in the Annual Compliance Report. The report shall specify a): the condition of the surfaces of all structures and buildings at the end of the reporting year; b) maintenance activities that occurred during the reporting year; and c) the schedule of maintenance activities for the next year.

PERMANENT EXTERIOR LIGHTING

VIS-4 To the extent feasible, consistent with safety and security considerations, the project owner shall design and install all permanent exterior lighting such that a light fixtures do not cause obtrusive spill light beyond the project site; b) lighting does not cause excessive reflected glare; c) direct lighting does not illuminate the nighttime sky; d) illumination of the project and its immediate vicinity is minimized, and e) the plan complies with local policies and ordinances.

The project owner shall submit to the CPM for review and approval and simultaneously to City and County of San Francisco Planning Department for review and comment a lighting mitigation plan that includes the following:

A. Location and direction of light fixtures shall take the lighting mitigation requirements into account;

B. Lighting design shall consider setbacks of project features from the site boundary to aid in satisfying the lighting mitigation requirements;

C. Lighting shall incorporate fixture hoods/shielding, with light directed downward or toward the area to be illuminated;

D. Light fixtures shall not cause obtrusive spill light beyond the project boundary;

E. All lighting shall be of minimum necessary brightness consistent with operational safety and security; and

F. Lights in high illumination areas not occupied on a continuous basis (such as maintenance platforms) shall have (in addition to hoods) switches, timer switches, or motion detectors so that the lights operate only when the area is occupied.

Verification: At least 90 days prior to ordering any permanent exterior lighting, the project owner shall contact the CPM to discuss the documentation required in the lighting mitigation plan.

At least 60 days prior to ordering any permanent exterior lighting, the project owner shall submit to the CPM for review and approval and simultaneously to City and County of San Francisco Planning Department for review and comment a lighting mitigation plan. The Planning Department shall provide comments to the CPM 45 days prior to ordering date.

If the CPM determines that the plan requires revision, the project owner shall provide to the CPM a revised plan for review and approval by the CPM.

The project owner shall not order any exterior lighting until receiving CPM approval of the lighting mitigation plan

Prior to commercial operation, the project owner shall notify the CPM that the lighting has been completed and is ready for inspection. If after inspection the CPM notifies the project owner that modifications to the lighting are needed, within 30 days of receiving that notification the project owner shall implement the modifications and notify the CPM that the modifications have been completed and are ready for inspection.

Within 48 hours of receiving a lighting complaint, the project owner shall provide the CPM with a complaint resolution form report as specified in the Compliance General Conditions including a proposal to resolve the complaint, and a schedule for implementation. A copy of the complaint resolution form report shall be submitted to the CPM within 30 days of complaint resolution.

SIGNAGE

VIS-5 The project owner shall install minimal signage visible to the public, which shall a) have unobtrusive colors and finishes that prevent excessive glare; and b) be consistent with the policies and ordinances of the City and County San Francisco. The design of any signs required by safety regulations shall conform to the criteria established by those regulations.

Verification: At least 30 days prior to commercial operation, the project owner shall notify the CPM and City and County San Francisco Planning Department that appropriate signage has been installed and is ready for inspection prior to the start of commercial operation, and shall provide the CPM with electronic color photographs of the signage. If the CPM determines that signage requires changes, the project owner shall complete the changes within 60 days and notify the CPM that the changes have been completed.

PLUMES

VIS-6 To ensure that the cooling tower plumes will not cause significant visual impacts, the project owner shall ensure that the cooling tower is designed and operated as certified.

The cooling tower shall be designed and operated so that (1) the exhaust air flow rate (per cooling tower cell) will not be less than 118 kilograms per second at 52 degrees Fahrenheit and 60 percent relative humidity and will not be less than 108 kilograms per second at 80 degrees Fahrenheit and 36 percent relative humidity when the cooling tower cell fan is operating; and (2) the fan from at least one cooling tower cell shall be operating when the cooling tower is receiving any heat load from the turbine inlet air chiller(s).

Verification: At least 90 days prior to ordering the cooling towers, the project owner shall provide to the CPM for review the final design specifications of the cooling tower to confirm that design mass flow rates for the cooling tower cells meet the requirements of this Condition. The project owner shall not order the cooling tower until notified by the CPM that this design requirement has been satisfied.

The project owner shall provide written documentation in each Annual Compliance Report to demonstrate that the cooling towers have consistently been operated within the above-specified design parameters, except as necessary to prevent damage to the cooling tower. If determined to be necessary to ensure operational compliance, based on legitimate complaints received or other physical evidence of potential non-compliant operation, the project owner shall monitor the cooling tower operating parameters in a manner and for a period as specified by the CPM. For each period that the cooling tower operation monitoring is required, the project owner shall provide to the CPM the cooling tower operating data within 30 days of the end of the monitoring period. The project owner shall include with this operating data an analysis of compliance and shall provide proposed remedial actions if compliance cannot be demonstrated.

REFERENCES

CCSF - City and County of San Francisco Planning Department. General Plan.

CCSF - City and County of San Francisco Planning Department. Planning Code.

CDT – California Department of Transportation. California Scenic Highway Program.

SECAL - Southern Energy California. 2001a. Amendment to the Application for Certification, Potrero Power Plan Unit 7 Project (00-AFC-4). Addresses the demolition of six existing structures. Submitted to the California Energy Commission on 1/19/2001.

SFERP 2004q - CH2MHill/Carrier (tn: 31854). Data Responses Set 1A. Responses to Staff's Data Requests data 6/4/04. Submitted to CEC/Pfanner/Dockets on 7/6/04.

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SFPUC 2005a – San Francisco Public Utilities Commission/Hale (tn: 34403). Amendment A of the Application for Certification. Submitted to CEC/Therkelsen/Dockets on 3/25/05.

Walters, William, and Lisa Blewitt. Visible Plume Analysis for San Francisco Electric Reliability Project. Modeling analysis prepared by William Walters and Lisa Blewitt of Aspen Environmental Group for Energy Commission staff. 8/10/2004.

APPENDIX VR-1: STAFF'S VISUAL RESOURCES EVALUATION METHODOLOGY

Visual resources analysis has an inherent subjective aspect. Use of generally accepted criteria for determining environmental impact significance and a clearly described analytical approach aid in developing an analysis that can be readily understood.

Staff's methodology is based on the California Environmental Quality Act (CEQA) Guidelines. The methodology includes an evaluation of the visual characteristics of the existing setting, the visual characteristics of the proposed project, the circumstances affecting the viewer, and the degree of visual impact that the proposed project would cause.

ELEMENTS OF THE METHODOLOGY

Key Observation Points

A proposed project is potentially visible from a number of areas in a viewshed. Energy Commission staff evaluate the visual impact of the project using a Key Observation Point[5], or KOP. One or more KOPs are selected to be representative of the most critical locations from which the proposed project would be seen. A KOP is representative of a location from which to conduct a detailed analysis of the project, and includes an existing condition/setting photograph, and simulation of the proposed project using the existing condition photograph.

Prior to application submittal, staff participates in a site visit to select appropriate KOP(s) for the analysis. Other photos to demonstrate the general landscape character of the project area are also included, as appropriate.

LORS Consistency

Energy Commission staff consider federal, state, and local laws, ordinances, regulations, and standards (LORS) relevant to visual resources. Conflicts with such LORS can constitute significant visual impacts. For example visual staff examines land use planning documents, such as local government General Plans and Specific Plans, and zoning ordinances applicable to the project site and surrounding area to gain insight as to the type of land uses intended for the area, and the guidelines given for the protection or preservation of visual resources.

Visible Water Vapor Plume Frequency

Staff models the estimated turbine plume frequency and dimensions for the cooling tower and turbine exhaust using the Combustion Stack Visible Plume (CSVP) model, and a multi-year meteorological data set obtained for the area where the project is proposed.

[5] The use of KOPs or similar view locations is common in visual resource analysis. The US Bureau of Land Management and the US Forest Service use such an approach.

A plume frequency of 20 percent of seasonal (typically from November through April) daylight no rain/fog high visual contrast (i.e. "clear") hours is used to determine potential plume impact significance. If it is determined that the seasonal daylight clear hour plume frequency is greater than 20 percent then plume dimensions are determined and a significance analysis is included in the Visual Resources section of the Staff Assessment for the proposed project. Plume frequencies of less than 20 percent have been determined to generally have a less than significant impact.

California Environmental Quality Act Guidelines

The CEQA Guidelines define a "significant effect on the environment" to mean a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including . . . objects of historic or aesthetic significance" (California Code of Regulations, Title 14, Section 15382).

Appendix G of the Guidelines, under Aesthetics, lists the following four questions to be addressed regarding whether the potential impacts of a project are significant:

1. Would the project have a substantial adverse effect on a scenic vista?
2. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
3. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?
4. Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

The visual analysis typically distinguishes between three different impact durations: temporary impacts, typically lasting no longer than two years; short-term impacts, generally last no longer than five years; and long-term impacts, which are impacts with a duration greater than five years. In general, short-term impacts are not considered significant.

In addition to visiting the project area for personal observation of how and whether a particular view is experienced, staff also searches for other evidence to determine if the local community values a particular view that might be affected by the project. This includes searching the applicable planning documents covering the area produced by local governments and community groups, as well as searches for any other type of evidence showing whether valued scenic vistas exist within the project's viewshed. Staff relies primarily on personal observation of the project site to make initial determinations of visual character or quality of the area, in comparison with all other landscapes in California, but also gives due deference to official statements by elected governmental bodies concerning the value of visual resources within the project area.

Staff answers each of the four checklist questions for each part of the project both during construction and during operation, including any related facility such as a transmission line or gas pipeline. To answer the first checklist question (Would the project have a substantial adverse effect on a scenic vista?), staff must determine if any

such scenic vista exists within the viewshed of the various aspects of the project, and then determine if the project would have a substantial adverse effect on that vista.

To help make these determinations, visual resource professionals often answer a series of questions developed to help focus the analysis, and examine various ways that the project could create an impact to scenic vistas. The Energy Commission's Visual Resources staff has developed such a list for each of the four CEQA guideline questions, drawing upon published methodologies and academic resources (Smardon, et al.), as well as on past experience with other power plant siting cases. Questions developed to help determine whether the project would significantly affect a scenic vista include:

1. Is the project located in the scenic view of a local/state/federal-designated scenic vista?
2. Is there compelling evidence to show that the view is designated/valued by the local community?
3. Will the project eliminate or block views of valuable visual resources?
4. Would the project create a water vapor plume that could have an adverse effect on a state/federal/local-designated scenic vista?

To help answer the second CEQA checklist question above (Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?), staff developed the following questions:

1. Is the project located in the scenic view from a local/state/federal-designated scenic highway?
2. Does the project site or its immediate vicinity contain scenic resources, such as trees, rock outcroppings, or historic structures that could be damaged by the project?
3. Would the project create a water vapor plume that could have an adverse effect on the view from a local/state/federal-designated scenic highway?

To answer the third question (Would the project substantially degrade the existing visual character or quality of the site and its surroundings?), staff assesses the existing visual character and quality of the project area, and then determines how the project would affect the character and quality of the project viewshed. To assess whether the project has the potential to substantially degrade the present visual character or quality, staff uses personal observation and such tools as visual simulations to determine if an impact is significant and mitigation is required to reduce the impact to a less-than-significant level. To make that determination, staff examines many factors, such as: how many viewers can see a particular view and for how long, collectively called "viewer exposure;" and to what degree would the project change the aspects of a given view, such as whether the project's components would block a particular view.

To help determine how the community rates and values the visual character and quality of a given site, and whether the project would substantially alter the present visual character or quality, staff developed the following questions:

1. How many residential, recreational, and traveling (motorist) viewers would have views of the project?
2. Is the project site properly zoned?
3. Would a conditional use permit and/or height variance have been required from the city/county (if so what conditions would the city/county place on the power plant)?
4. Does the project conform to the clear written declarations of local/state/federal agencies to protect designated visual resources of importance or the valued aesthetic character of a neighborhood (said declaration must be clear, concise, and uncompromised by conflicting declarations, and be an official action of the governing body (City Council/Board of Supervisors) such as a General Plan element, zoning ordinance, or design guideline)?
5. Will the project substantially alter the existing viewshed, including any changes in natural terrain?
6. Does the project substantially change the existing setting?
7. Has the applicant proposed landscaping?
8. Would the project create a water vapor plume that could have an adverse effect on a KOP view?

The process of answering these questions includes an examination of the present views within the project viewshed in terms of aesthetics – i.e., by examining the various aspects that together define the quality of a view – followed by an assessment of how the various aspects of the aesthetics of the view would be affected by the project, which conversely could be described as an analysis of how well the project area can absorb the various aspects of the project into the landscape.

To answer the fourth CEQA Guidelines checklist question (Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?), staff analyzes the project's lighting plans to ensure they fit with established norms for low-impact lighting designs, and then answers the following questions to determine if a potential for impact from night-lighting exists:

1. With the Energy Commission's standard condition of certification for lighting control, would light or glare be reduced to acceptable levels?
2. Will the project result in significant amounts of backscatter light into the nighttime sky?

APPENDIX VR-2

VISIBLE PLUME MODELING ANALYSIS

William Walters and Lisa Blewitt

INTRODUCTION

The following provides the assessment of the San Francisco Electric Reliability Project (SFERP) cooling tower and gas turbine exhaust stack visible plumes. Staff completed a modeling analysis for the applicant's proposed unabated cooling tower and turbine design.

PROJECT DESCRIPTION

The applicant has proposed a two-cell mechanical-draft cooling tower. The cooling tower load comes primarily from the turbine inlet air chillers; therefore, the cooling load is very small until the temperature is warm enough to run the inlet air chillers and then increases with ambient temperature. The applicant has not proposed to use any methods to abate visible plumes from the cooling towers.

The proposed gas turbines will be General Electric LM 6000 PC Sprint type engines. The turbines will be operated in simple-cycle mode.

VISIBLE PLUME MODELING METHODS

PLUME FREQUENCY AND DIMENSION MODELING

The CSVP model was used to estimate plume frequency and plume dimensions for the cooling tower and turbine exhausts. This model provides conservative estimates of both plume frequency and plume size. This model uses both hourly exhaust parameters and ambient condition data to determine the plume frequency. This model is based on the algorithms of the Industrial Source Complex model (Version 2), that determine conditions at the plume centerline and this model does not incorporate building downwash.

The modeling method combines the cooling tower exhausts into an equivalent single stack. This method may overestimate cooling tower plume size (particularly height) during plume hours with higher winds due to little cell interaction and the potential for building downwash, but will be more accurate during low wind and calm periods when the exhausts from the cooling tower cells will combine into one coherent body. Wind speeds are set to 1 m/s during calm hours.

CLOUD COVER DATA ANALYSIS METHOD

A plume frequency of 20 percent of seasonal (in this case June through November) daylight no rain/fog high visual contrast (i.e. "clear") hours is used to determine potential plume impact significance. The high visual contrast hours analysis methodology is provided below:

> The Energy Commission has identified a "clear" sky category during which plumes have the greatest potential to cause adverse visual impacts. For this project the meteorological data set[6] used in the analysis categorizes total sky cover and opaque sky cover in 10 percent increments. Staff has included in the "Clear" category a) all hours with total sky cover equal to or less than 10 plus b) half of the hours with total sky cover 20-100 percent that have sky opacity equal to or less than 50 percent. The rationale for including these two components in this category is as follows: a) plumes typically contrast most with sky under clear conditions and, when total sky cover is equal to or less than 10 percent, clouds either do not exist or they make up such a small proportion of the sky that conditions appear to be virtually clear; and b) for a substantial portion of the time when total sky cover is 20-100 percent and the opacity of sky cover is relatively low (equal to or less than 50 percent), clouds do not substantially reduce contrast with plumes; staff has estimated that approximately half of the hours meeting the latter sky cover and sky opacity criteria can be considered high visual contrast hours and are included in the "clear" sky definition.

If it is determined that the seasonal daylight clear hour plume frequency is greater than 20 percent then plume dimensions are determined and a significance analysis of the plumes is included in the Visual Resources section of the Staff Assessment.

COOLING TOWER VISIBLE PLUME MODELING ANALYSIS

COOLING TOWER DESIGN AND OPERATING PARAMETERS

The following cooling tower design characteristics, presented below in **Table 1**, were determined through a review of the applicant's AFC (SFERP 2004a, Appendix 8.1) and data responses (SFERP 2004q and 2004u responses to #85). The data presented in **Table 1** was used to model the cooling tower plume frequency and dimensions.

[6] This analysis uses a San Francisco International Airport (SFO) Hourly United States Weather Observations (HUSWO) meteorological data set obtained from the National Climatic Data Center (NCDC).

Table 1
Cooling Tower Operating and Exhaust Parameters [a]

Parameter		Cooling Tower Design Parameters			
Number of Cells		2 (1 x 2)			
Stack Height (Cell Cone Height)		41.9 feet (12.76 meters)			
Cell Stack Diameter		13 feet (3.96 meters)			
Case	Inlet Air Ambient Condition	Chilling	Heat Rejection Rate (MW)	Exhaust Flow Rate (lbs/s/cell)	Exhaust Temperature (°F)
1 [b]	36°F, 81% RH	No	0.78	284.3	39.8
2 [b]	50°F, 60% RH	No	0.78	277.8	48.8
3 [b]	52°F, 60% RH	Yes	1.88	274.5	56.9
4 [b]	59°F, 60% RH	Yes	3.94	267.4	71.4
5	80°F, 36% RH	Yes	11.42	251.0	85.4

Source: SFERP 2004q, Data Response 85.
Notes:
a. For CSVP modeling, values were extrapolated or interpolated between data points as necessary.
b. Only one of the two cooling tower cells is needed under these operating conditions. Staff has revised the exhaust flow rate to one cell and has, through the use of a heat balance, revised the exhaust temperature presented by the applicant. During cool periods with very load the cooling tower may actually be operated with the recirculating water flow on and the cooling tower fans off; however, staff does not have enough information to be able to model this low exhaust flow condition.

COOLING TOWER VISIBLE PLUME MODELING ANALYSIS

Staff modeled the cooling tower plumes using the Combustion Stack Visible Plume (CSVP) model. **Table 2** provides the CSVP model visible plume frequency results using six-year (1990-1995) meteorological data set, obtained from NCDC, from SFO.

Table 2 – Staff Predicted Hours with Cooling Tower Steam Plumes
SFO 1990-1995 Meteorological Data

Protocol: Case	Protocol: Available (hr)	Protocol: Plume (hr)	Protocol: Percent
Protocol: All Hours	Protocol: 52,583	Protocol: 9,588	Protocol: 18.2%
Protocol: Daylight Hours	Protocol: 26,843	Protocol: 2,635	Protocol: 9.8%
Protocol: Daylight Hours No Rain No Fog	Protocol: 24,694	Protocol: 1,772	Protocol: 7.2%
Protocol: Season Daylight No Rain No Fog*	Protocol: 13,523	Protocol: 1,355	Protocol: 10.0%
Protocol: Season Daylight Clear*	Protocol: 9,017	Protocol: 444	Protocol: 4.9%

*Seasonal conditions occur anytime from June through November.

For the proposed cooling tower, due to the cooling load being directly related to ambient temperature, the worst case seasonal plume conditions are forecast to occur from June through November when the inlet air chillers are operating more frequently.

A plume frequency of 20 percent of seasonal (in this case June through November) daylight clear hours is used as a plume impact study threshold trigger. The plant design, incorporating several conservative operating assumptions indicates that the cooling tower plume frequency will be less than 20 percent of seasonal clear hours.

TURBINE VISIBLE PLUME MODELING ANALYSIS

Staff evaluated the applicant's AFC (SFERP 2004a) and performed an independent psychrometric analysis and dispersion modeling analysis. The Combustion Stack Visible Plume (CSVP) model was used to estimate the worst-case potential plume frequency for each turbine stack.

HRSG PARAMETERS

Based on the stack exhaust parameters anticipated by the applicant the frequency of visual plumes can be estimated. The turbine exhaust data are provided in **Table 3**.

Table 3
Turbine Exhaust Parameters

Parameter	Turbine Exhaust Parameters			
Stack Height	85 feet (25.9 meters)			
Stack Diameter	12 feet (3.66 meters)			
Ambient Conditions	Molecular Weight [b]	Moisture Content (% by weight) [b]	Exhaust Flow Rate (klb/hr) [b]	Exhaust Temp (°F) [b]
Full Load w/Inlet Air Chilling				
36 °F [a]	28.11	6.61	1,128.2	805
59 °F	28.03	7.18	1,107.5	826
80 °F	28.02	7.21	1,107.2	826
50% Load				
36 °F	28.25	5.56	745.4	819
59 °F	28.30	5.19	768.9	782
80 °F	28.37	4.75	787.1	744

Source: AFC (SFERP 2004a, Appendix 8.1A, Table 8.1A-1 and Appendix 8.1B Table 8.1B-1). Some values were calculated using data presented in Table 8.1A-1.

Note(s): a. No inlet evaporative cooling at 36 °F.
b. Values were extrapolated or interpolated between hourly ambient condition data points as necessary.

HRSG VISIBLE PLUME MODELING ANALYSIS

Staff modeled the turbine plumes using the CSVP model with a six-year meteorological data set from SFO. No plumes were predicted to occur under full load or 50 percent load conditions. The high temperature of the simple-cycle turbine exhaust should preclude the formation of visible water vapor plumes under all normally anticipated worst-case weather conditions and worst-case operating conditions.

CONCLUSIONS

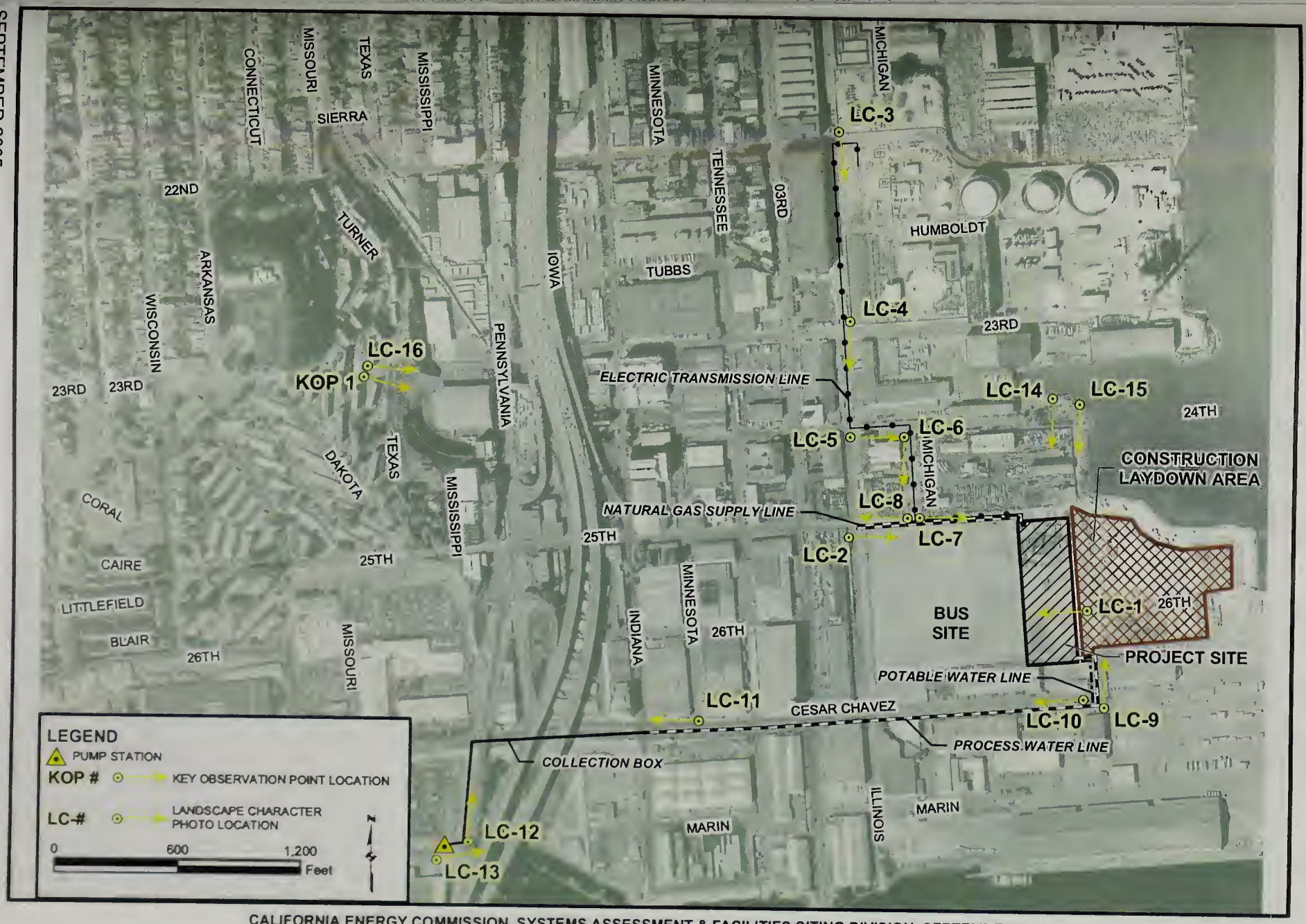
Visible water vapor plumes from the proposed SFERP cooling tower are not expected to occur greater than 20 percent of seasonal daylight clear hours. No visible water vapor plumes are expected to occur from the turbine exhausts.

REFERENCES

SFERP 2004a - City and County of San Francisco/Blout (tn: 31130). Application for Certification San Francisco Electric Reliability Project - 145-megawatt natural gas-fired peaking power plant located in San Francisco. Submitted to CEC/Therkelsen/Dockets on 3/18/04.

SFERP 2004q – CH2MHill/Carrier (tn: 31854). Data Responses Set 1A. Response to Staff's Data Requests dated 6/4/04. Submitted to CEC/Pfanner/Dockets on 7/6/04.

SFERP 2004u – CH2MHill/Carrier (tn: 31948). Informal Data Response Set 1. Submitted to CEC/Pfanner/Dockets on 7/23/04.



CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005
SOURCE: AFC Supplement A, Figure 8.11-1

Existing View of Proposed Project Site from Watchman Way Residences

CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: AFC Supplement A, Figure 8.11-12a

Simulated View of the Project Site from Watchman Way Residences

CALIFORNIA ENERGY COMMISSION, SYSTEMS ASSESSMENT & FACILITIES SITING DIVISION, SEPTEMBER 2005

SOURCE: AFC Supplement A, Figure 8.11-12b

WASTE MANAGEMENT

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SUMMARY OF CONCLUSIONS

Waste generated during construction and operation of the San Francisco Electric Reliability Project or those associated with remediation of existing on-site contamination would not result in any significant adverse impacts if the management measures contained in the Amended Application for Certification and the proposed conditions of certification are implemented per the pertinent laws, ordinances, regulation, and standards.

INTRODUCTION

This Preliminary Staff Assessment (PSA) presents an analysis of issues associated with managing wastes generated from constructing and operating the proposed San Francisco Electric Reliability Project (SFERP) and any hazardous wastes already existing on-site as a result of past activities. Staff evaluated the proposed waste management plans and mitigation measures designed to reduce the risks and environmental impacts associated with handling, storing, and disposing of project-related hazardous and nonhazardous wastes and for potential site remediation. The technical scope of this analysis encompasses solid wastes existing on-site and those generated during facility construction and operation. Wastewater is more fully discussed in the **Soil and Water Resources** section of this document.

Energy Commission staff's objectives in its waste management analysis are to ensure that:

- The management of the wastes would be in compliance with all applicable laws, ordinances, regulations, and standards (LORS). Compliance with LORS ensures that wastes generated during the construction and operation of the proposed project would be managed in an environmentally safe manner.
- The disposal of project wastes would not result in significant adverse impacts to existing waste disposal facilities.
- Upon project completion, the site is managed such that contaminants would not pose a significant risk to humans or the environment.

WASTE MANAGEMENT Table 1
Laws, Ordinances, Regulations, and Standards (LORS)

Applicable Law	Description
Federal	
42 U.S.C. § 6922 Resource Conservation and Recovery Act	The RCRA establishes requirements for the management of hazardous wastes from the time of generation to the point of ultimate treatment or disposal. Section 6922 requires generators of hazardous waste to comply with requirements regarding: • Record keeping practices which identify quantities of hazardous wastes generated and their disposition, • Labeling practices and use of appropriate containers, • Use of a manifest system for transportation, and • Submission of periodic reports to the Environmental Protection Agency (EPA) or authorized state agency.
Title 40, Code of Federal Regulations, part 260	These sections contain regulations promulgated by the EPA to implement the requirements of RCRA as described above. Characteristics of hazardous waste are described in terms of ignitability, corrosivity, reactivity, and toxicity, and specific types of wastes are listed.
State	
California Health and Safety Code §25100 et seq. (Hazardous Waste Control Act of 1972, as amended)	This act creates the framework under which hazardous wastes must be managed in California. It mandates the State Department of Health Services (now the Department of Toxic Substances Control (DTSC) under the California Environmental Protection Agency (Cal EPA) to develop and publish a list of hazardous and extremely hazardous wastes, and to develop and adopt criteria and guidelines for the identification of such wastes. It also requires hazardous waste generators to file notification statements with Cal EPA and creates a manifest system to be used when transporting such wastes. The San Francisco Department of Public Health enforces this Act.
Title 14, California Code of Regulations, §17200 et seq. (Minimum Standards for Solid Waste Handling and Disposal)	These regulations set forth minimum standards for solid waste handling and disposal, guidelines to ensure conformance of solid waste facilities with county solid waste management plans, as well as enforcement and administration provisions.
Title 22, California Code of Regulations, §66262.10 et seq. (Generator Standards)	These sections establish requirements for generators of hazardous waste. Under these sections, waste generators must determine if their wastes are hazardous according to either specified characteristics or lists of wastes. As in the federal program, hazardous waste generators must obtain EPA identification numbers, prepare manifests before transporting the waste off-site, and use only permitted treatment, storage, and disposal facilities. Additionally, hazardous waste must only be handled by registered hazardous waste transporters. Generator requirements for record keeping, reporting, packaging, and labeling are also established.
Title 22, California Code of	(Hazardous Waste Source Reduction and Management Review.)These sections establish reporting requirements for generators of certain

Regulations, §67100.1 et seq.	hazardous and extremely hazardous wastes in excess of specified limits. The required reports must indicate the generator's waste management plans and performance over the reporting period.
The Asbestos Airborne Toxic Control Measure	The California Air Resources Board (CARB) adopted the Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations which became effective in the BAAQMD in 2002. The ATCM requires specific mitigation measures to prevent off-site migration of asbestos-containing dust.
Local	
Article 6 of the San Francisco Health Code	This Article controls solid non-hazardous waste production during construction and operation of the project and is enforced by the San Francisco Department of Public Health (SFDPH). The SFDPH has the responsibility for administration and enforcement of waste management laws regarding solid non-hazardous and hazardous wastes at the proposed energy center. Recycling of non-hazardous wastes is governed by the San Francisco Department of the Environment.
Article 4.1 of the San Francisco Public Works Code and the San Francisco Department of Public Works Order No. 158170	Regulate quantity and quality of industrial discharge to the combined sewer system, and specify requirements for discharge of non-hazardous wastewater.
Article 22A of the San Francisco Health Code	Enforced by the SFDPH and requires preparation of a site history report, implementation of soil investigation to evaluate presence of hazardous wastes in the soil, preparation of soil analysis report, site mitigation report, and certification report prior to excavation activities.
BAAQMD Regulation 11-2	Includes notification requirements for demolition projects, and must be complied with before a demolition permit is granted.
The San Francisco Building Code Chapter 34, Section 3407	Contains requirements for handling of lead-based paint on the exterior of buildings or steel structures during demolition. This code is enforced by the San Francisco Department of Building Inspection.
California Fire Code	Enforced by the local Fire Department, and includes a requirement that businesses obtain permits for the use and storage of specified hazardous materials. This permit must be obtained before storing regulated hazardous wastes at the project site.

SETTING

The proposed project site is located in a former Western Pacific train yard that was used to transfer, store, and fuel rail cars carrying mostly dry goods (SFPUC 2005a, Section 3.13.3). There are several temporary structures on the proposed site including trailers, a construction laydown area, and a cement batch plant, which would be demolished and removed prior to construction (SFPUC 2005a, Section 2.2.1).

A site characterization study was conducted on the proposed project site by Dames & Moore in 1987. The only findings were drums and containers that were subsequently disposed off-site. A site investigation of soil and groundwater in the area proposed to be occupied by a MUNI facility (including parts of the proposed power plant site) was

conducted by AGS Inc. in 1999. The investigation concluded that both soil and groundwater in portions of the MUNI site are contaminated with petroleum hydrocarbons (from diesel), motor oil, Bunker C-oil, arsenic, and lead (SFPUC 2005a, Section 8.13.3). Since the proposed SFERP site is adjacent to the proposed MUNI site and had been historically used for the same purpose, it is likely that the same levels of contamination exist in soil and groundwater at the SFERP site. Many of the groundwater samples analyzed in the 1999 AGS site investigation were obtained from the proposed power plant site and showed elevated levels of lead, arsenic, carcinogeni Polycyclic Aromatic Hydrocarbons (PAHs), benzene, and hexavalent chromium. However, no soil samples were obtained in the 1999 study from the proposed power plant site. The existing cement batch plant may also have contributed to soil and groundwater contamination and this portion of the site remains to be fully characterized

In addition to sampling and analysis, the AGS report contained a human health risk assessment which purports to show that contaminants pose an insignificant risk to on-site workers or the off-site public. Staff finds, however, that it is inappropriate to use this health risk assessment as a basis for stating no significant risk exists because the assessment methodology used in 1999 is both outdated and inconsistent with current Cal EPA policies and guidelines. For example, the 1999 AGS report compares soil and groundwater values with Region 9 USEPA Preliminary Remediation Goals (PRGs), a practice that is now discouraged by Cal EPA Department of Toxic Substances Control.

If a comparison to screening levels is to be made, staff recommends the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESLs) should be used. Also, in 1999, Naphthalene was not assessed as a carcinogen but it was identified and listed as such in 2004 by Cal EPA. However, a site mitigation plan containing a Risk Management Plan (RMP), a Site Management Plan (SMP), and deed restriction administered by the SFBRWQCB exists for the MUNI site that adjoins the power plant site (SFPUC 2005a, page 8.13.16). The applicant has stated that these three requirements should be extended to the power plant site (SFPUC 2005a, page 8.13.17). The applicant has also stated that contaminant analysis of soils will be made and reported based on the geotechnical soil boring that will be conducted in the next few months. This additional information will be reviewed and evaluated by staff.

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

Two issues are addressed in this Waste Management section: potential site contamination and the methods used to handle wastes (Class I hazardous wastes, Class II designed wastes, and Class III municipal solid wastes) during construction and operations. The methods staff uses and the thresholds for determining significance of impacts are different for these two issues.

For any site proposed for the construction of a power plant in California, the applicant must provide sufficient documentation about the nature of any contamination on the site. Staff requires that at the least, a Phase I Environmental Site Assessment (ESA) be

prepared and submitted to the Energy Commission for staff's review and evaluation. A Phase I ESA provides a history of use of the site, often as far back as the mid-1800s, and a list of any hazardous waste release within a certain distance of the site. If there is a reasonable potential that the site contains hazardous waste, soil or groundwater would be sampled and analyzed as part of a Phase II ESA.

Staff may utilize either of two metrics to determine if hazardous waste present on the site would pose a risk to on-site workers or the off-site public. The first metric follows standards promulgated by Cal-EPA, principally by the Department of Toxic Substances Control (DTSC), the Office of Environmental Health Hazard Assessment (OEHHA), and the Regional Water Quality Control Boards (RWQCB). Staff would compare the levels of contaminants found on-site with standards such as the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESLs) or the Cal-EPA Office of Environmental Health Hazard Assessment (OEHHA) California Human Health Screening Levels (CHHSLs). If metals are suspected of being present at unsafe levels, staff would first compare those levels to levels that occur naturally in soil or water as tabulated by DTSC or other federal agencies.

The second method involves the preparation of a site-specific Human Health Risk Assessment or Ecological Risk Assessment. The human health risk assessment would follow Cal-EPA guidelines and must address all affected populations including the most burdened and compromised receptors. Staff would require the applicant to prepare such an assessment and would require some form of remediation if the human health cancer risk exceeded one-in-one million, the non-cancer hazard index exceeded 1.0, or the ecological risks were significant, per 42 U.S.C. § 6922 (Resource Conservation and Recovery Act), California Health and Safety Code §25100 et seq. (Hazardous Waste Control Act of 1972, as amended), and Article 22A of the San Francisco Health Code.

Regarding the management of wastes, staff reviews the applicant's proposed solid and hazardous waste management methods and determines if the methods meet the state standards for waste reduction and recycling. Staff then reviews the available off-site treatment and disposal sites available and determined whether or not the proposed power plant's waste would have a significant impact on the disposal sites allotted daily, yearly, or lifetime volume of waste it is allowed to receive. Staff uses a threshold of less than 10percent impact on a waste disposal facility to determine if the impact would be significant.

DIRECT/INDIRECT IMPACTS AND MITIGATION

Existing Contamination

During soils excavation and demolition/removal of the cement plant for this project, some of the soil excavated and building materials demolished/removed may contain asbestos, lead, or other chemicals at unexpected levels and thus may require specific handling, disposal, and other precautions. Asbestos Containing Materials (ACM) used in construction would be required to be removed as per Cal/OSHA regulations including 8 CCR 1529, 8 CCR 5208 and Department of Toxic Substances Control regulations including Health and Safety Code sections 25914.1-3 and 25915 et seq., and BAAQMD Regulation 11-2 which contains notification requirements for demolition projects that

must be complied with before a demolition permit is granted. Regarding removal of lead containing materials, mostly lead-based paint, the requirements of 8 CCR 1532.1 and San Francisco Building Code Chapter 34, Section 3407 would have to be followed. Staff believes that adherence to proposed Condition of Certification **Waste-10** requiring identification and removal of asbestos containing materials (ACM) and Regulated Buildings Materials would adequately address this issue. However, the cement batch plant may also have contributed to soil and/or groundwater contamination and thus that portion of the site remains to be fully characterized. Staff's proposed condition of certification **Waste-8** would require full site characterization and remediation prior to site mobilization. Other proposed conditions of certification **Waste-1** and **Waste-2** (which require having a Registered Professional Engineer or Geologist with experience in remedial investigation and feasibility studies available for consultation during soil excavation and grading activities) would be adequate to address any unknown additional soil or groundwater contamination contingency that may be encountered.

Staff finds, however, that it is inappropriate to use the AGS 1999 health risk assessment as a basis for determining health risks of site workers and the public during site excavation and therefore a revised health risk assessment must be prepared prior to site mobilization. Furthermore, the site mitigation plan containing a Risk Management Plan (RMP), a Site Management Plan (SMP), and deed restriction administered by the SFBRWQCB presently includes only the MUNI site that adjoins the power plant site, and should be extended to the power plant site. Staff therefore proposes condition of certification **Waste-7** (which requires a revised human health risk assessment and extension of SFBRWQCB oversight to the site). Staff believes that this condition of certification would be adequate to address current potential health risks prior to site mobilization.

Construction Impacts and Mitigation

Site preparation and construction of the proposed generating plant and associated facilities would last approximately 12 months and generate both nonhazardous and hazardous wastes in solid and liquid forms.

Metal debris from welding/cutting activities, packing materials, electrical wiring, and empty non-hazardous chemical containers would be generated during construction. Approximately 15 tons of waste metal is anticipated to be generated during construction. Nonhazardous solid wastes generated during construction would include up to 10 tons of wood, paper, glass, and plastic waste products comprised of excess lumber, packing materials, insulation, and empty non-hazardous chemical containers (SFPUC 2005a, Section 8.13.4.1.2). All non-hazardous wastes would be recycled to the extent possible and non-recyclable wastes would be collected by a licensed hauler and disposed of in a solid waste disposal facility, per Title 14, California Code of Regulations, §17200 et seq. (Minimum Standards for Solid Waste Handling and Disposal) and Article 6 of the San Francisco Health Code.

Soil excavation during construction would comply with Article 22A of the San Francisco Health Code, which requires preparation of a site history report, implementation of soil investigation to evaluate presence of hazardous wastes in the soil, preparation of soil analysis report, site mitigation report, and certification report. These reports would also

include portions of the wastewater line that are between the historical high tide line and the bay. Since excavation activities and trenching during the construction of the proposed water pipeline may encounter potentially contaminated soils and/or groundwater, specific handling, disposal, and other precautions may be necessary as per 22 CCR 66262.10. A Phase I ESA would be needed for the pumping station site and the pipeline route prior to site preparation and a Phase II ESA may also be needed depending upon the findings and recommendations of the Phase I ESA.

The applicant proposes to reuse all excavated soil on the site with the exception of contaminated soil. Contaminated soil would be tested and classified in accordance with 22, CCR66262.10 et seq. and may be disposed offsite at an appropriate land disposal facility if applicable. If any of the soil excavated does not meet the requirements for land disposal set in CCR Title 22, then further treatment would be applied to reduce contamination to acceptable levels for disposal. (SFPUC 2005a, Section 8.13.6.1.1).

Because the potential exists to encounter asbestos-containing material at the site, standard mitigation measures to reduce fugitive dust would be implemented by the applicant as specified in CARB's Asbestos Airborne Toxics Control Measure (ATCM). If more than one acre of asbestos-containing soil would be disturbed during construction, the applicant would prepare a dust mitigation plan that will ensure no visible dust beyond the site boundary. This plan would be submitted for approval to the BAAQMD prior to beginning of construction activities, per the Asbestos Airborne Toxics Control Measure. The BAAQMD may also require air monitoring of asbestos dust during construction to ensure the effectiveness of the mitigation measures (SFPUC 2005a, Section 8.13.6.1.1).

Nonhazardous liquid wastes would be generated during construction, and are discussed in the **Soil and Water Resources** section of this document. Storm water runoff would be managed in accordance with a Drainage, Erosion and Sediment Control Plan that would be prepared for the project and approved prior to construction. Other wastewaters would be sampled to determine their disposal. If the wastewater is found to be non-hazardous, it would be treated and discharged to the San Francisco combined sewer system in accordance with City requirements (Article 4.1 of the San Francisco Public Works Code and the San Francisco Department of Public Works Order No. 158170). If the wastewater is found to be hazardous, it would be collected and disposed of at a permitted hazardous waste management facility in accordance with California Health and Safety Code §25100 et seq. (Hazardous Waste Control Act of 1972, as amended) and all other applicable regulations (SFPUC 2005a, Section 8.13.6.1)

Hazardous wastes anticipated to be generated during construction may include welding materials, paint, flushing and cleaning fluids, solvents, asbestos containing materials, and lead-based paint. Lead based paint disposal would be regulated by the San Francisco Building Code Chapter 34, Section 3407. The quantities of flushing and cleaning fluids are estimated to be once or twice the internal volume of the pipes cleaned. The quantity of all other hazardous wastes is expected to be minimal (SFPUC 2005a Section 8.13.4.1.4).

The applicant would be considered the generator of hazardous wastes at this site during the construction period. Wastes would be accumulated at satellite locations and then transported daily to the construction contractor's 90-day hazardous waste storage area located in the construction laydown area. The wastes thus accumulated would be properly manifested, transported and disposed of at a permitted hazardous waste management facility by licensed hazardous waste collection and disposal companies. Staff reviewed the disposal methods described in AFC subsection 8.13.6.1.4 and concluded that all wastes would be disposed in accordance with all applicable LORS.

Additionally, the applicant proposes to use treated wastewater for cooling. In providing wastewater from the city sewer system, there would be certain wastes associated with the construction and operations of the pumping facilities and the water pipeline. Minor amounts of hazardous and nonhazardous wastes would be generated during construction and operation of the pump station and pipeline. These consist of routine construction/operations wastes such as building materials, gasoline and diesel fuel leaks, lubricants (oil and grease), oily rags, paper, wood, scrap metal, etc. These amounts would be minor and if handled in the same manner as that described for the project site, would present an insignificant risk to workers and the public.

In section 8.13.6 of the Amended AFC, the applicant states that handling and management of construction waste would follow the hierarchical approach of source reduction, recycling, treatment, and disposal. Recycling of wastes would be prioritized in an effort to meet the City and County goals of 75 percent recycling by 2010 and 100 percent recycling by 2020. The minimal quantities of hazardous waste generated would not significantly impact the treatment and disposal resources available in California.

Operation Impacts and Mitigation

The proposed SFERP would generate both nonhazardous and hazardous wastes in solid and liquid forms under normal operating conditions.

Nonhazardous Solid Wastes

Nonhazardous solid wastes anticipated to be generated during operation include up to 20 cubic yards of waste annually, comprised of maintenance wastes and office wastes. These wastes would be recycled to the extent possible under the City and County's goals of 75 percent recycling by 2010 and 100 percent recycling by 2020. Non-recyclable wastes would be regularly transported offsite to a solid waste disposal facility (SFPUC 2005a, Sections 8.13.4.2.1 and 8.13.6.2.1).

Nonhazardous Liquid Wastes

Nonhazardous liquid wastes would be generated during facility operation, and are discussed in the **Soil and Water Resources** section of this document. Storm water runoff would be managed in accordance with a Drainage, Erosion and Sediment Control Plan. Other wastewaters would be sampled to determine their quality and disposed of by the appropriate method (SFPUC 2005a, Section 8.13.6.1). Cooling tower blowdown, plant drainage, reverse osmosis water, and backwash water from the power cycle makeup treatment would be discharged to the waste water collection system (SFPUC 2005a, Section 8.13.4.2.2).

Hazardous Wastes

Hazardous wastes anticipated to be generated during routine project operation include waste lubricating oil, lubrication oil filters from the combustion turbines, spent SCR catalyst, oily rags, cooling tower sludge, laboratory analysis waste, oil sorbents, and chemical feed area drainage. Staff concurs that Table 8.13-3 of the Amended AFC provides a complete list of these wastes, the amounts expected to be generated, and their disposal methods. The amounts of hazardous wastes generated during the operation of SFERP would be minimal, and recycling methods would be used to the extent possible. The remaining hazardous waste would be temporarily stored on-site, per the California Fire Code and Title 22, California Code of Regulations, §66262.10 et seq., and disposed of by licensed hazardous waste collection and disposal companies in accordance with all applicable regulations, per Title 22, California Code of Regulations, §66262.10 et seq.

In section 8.13.6 of the AFC, the applicant states that handling and management of operational waste would follow the hierarchical approach of source reduction, recycling, treatment, and disposal. Recycling of wastes would be prioritized in an effort to meet the City and County goals of 75 percent recycling by 2010 and 100 percent recycling by 2020. The minimal quantities of hazardous waste generated would not significantly impact the treatment and disposal resources available in California.

Impact on Existing Waste Disposal Facilities

Nonhazardous Solid Wastes

Section 8.13.5.1 and Table 8.13-3 of the Amended AFC list four Class II and III facilities that will accept nonhazardous solid wastes from the SFERP project. The City currently has an exclusive agreement with Waste Management Inc. (WMI) to dispose up to 15 million tons of non-hazardous waste and inert waste in the Altamont Landfill. The City's contract with WMI is expected to expire in approximately 2010. Thereafter, the City would be free to use any other available disposal facilities. The City has reached its goal of 50 percent recycling, and successful efforts to increase recycling percentages may extend the City's contract with WMI beyond 2010 (SFPUC 2005a, Section 8.13.5.1).

The City is conducting a search for additional landfill capacity available for use after 2010, and some of the nearby options are listed in Table 8.13-3 of the Amended AFC. The closest landfill to the SFERP is the Ox Mountain Sanitary Landfill in Half Moon Bay, approximately 26 miles away, with a remaining capacity of 44.6 million cubic yards and estimated closure date in 2018. The second closest landfill is the Kirby Canyon Recycling Station and Landfill in San Jose, approximately 47 miles away, which has a remaining capacity of over 57 million cubic yards and an estimated closure date in 2022. In total, the four listed facilities (including the Altamont Landfill) possess a total of over 128.8 million cubic yards of remaining capacity. The volume of solid nonhazardous waste from the SFERP requiring off-site disposal would be a small fraction of the existing combined capacity of the available Class III landfills and would not significantly impact the capacity or remaining life of any of these facilities.

Hazardous Wastes

Section 8.13.5.2 of the Amended AFC discusses the three Class I landfills in California: the Buttonwillow Landfill in Kern County, the Superstition Hills Landfill in Imperial County, and the Kettleman Hills Landfill in King's County. The Kettleman Hills facility also accepts Class II and Class III wastes. In total, there is an excess of 20 million cubic yards of remaining hazardous waste disposal capacity at these landfills, with up to 16 years of remaining operating lifetimes. In addition, the Kettleman Hills facility is in the process of permitting an additional 15 million cubic yards of disposal capacity, and the Buttonwillow facility is not expected to reach its capacity until 2040 at current disposal rates (SFERP Data Response WM-90). The amount of hazardous waste transported to these landfills has decreased in recent years due to source reduction efforts by generators and the transport of waste out of state that is hazardous under California law, but not federal law. The referenced section of the AFC also notes the service of numbers of offsite commercial hazardous waste treatment and recycling facilities that provide sufficient capacity for recycling or treating hazardous wastes in the state of California (SFPUC 2005a, Section 8.13.5.2.4).

Most of the hazardous waste generated by the SFERP would be generated during facility construction and startup in the forms of flushing and cleaning liquids. Volumes of hazardous wastes generated during facility operation would be minimal. According to the applicant, the only hazardous waste that would require disposal in a Class I landfill would be SCR catalyst units that cannot be recycled and cooling tower sludge if it is determined to be hazardous (SFERP Data Response WM-90). Accordingly, staff proposes Condition of Certification **WASTE-9** to require that the cooling tower sludge is tested as per 22 CCR 66262.10 and report the findings to the CPM in the monthly compliance report. Approximately 200 pounds per year (0.1 tons per year) of cooling tower sludge would be generated during operation. All hazardous wastes generated during both construction and operation would be transported offsite to a permitted treatment, storage, or disposal (TSD) facility for appropriate disposition, preferably recycling. The volume of hazardous waste from the SFERP requiring off-site disposal would be far less than staff's threshold of significance (10 percent of the existing combined capacity of the three Class I landfills) and would therefore not significantly impact the capacity or remaining life of any of these facilities.

Impact on the Southeast Water Pollution Control Plant

Since the SFERP project would result in a net removal of water from the San Francisco combined sewer system, staff evaluated the potential impacts this may cause to the Southeast Water Pollution Control Plant (SEWPCP). Staff contacted the SEWPCP senior sanitary engineer to determine if increasing concentration of waste and toxics in the water treated by the SEWPCP would impact their facility. SEWPCP staff stated that the amount of water that would be removed represents a very small fraction of the total water flow through the SEWPCP and therefore would not cause any impacts on their facility. More concentrated toxics or wastes in the wastewater would become diluted again by the time they arrive at the SEWPCP. Their average daily flow is approximately 65 million gallons per day (~18,000 gallons per minute) so a removal of 70-80 gallons per minute (the difference between SFERP average removal and average discharge back into the system) would be too small to cause an impact (SEWPCP 2004).

CUMULATIVE IMPACTS AND MITIGATION

As proposed, the quantities of nonhazardous and hazardous wastes generated during construction and operation of the SFERP would add to the total quantities of waste generated in San Francisco and the State of California. This facility would generate an estimated 25 tons of solid waste during construction and approximately 20 cubic yards per year during operation. However, due to recycling efforts, the applicant estimates that only 7 tons of waste generated during construction would require disposal, and only about 5 tons a year during operation. In addition, the facility would produce approximately 50 gallons of laboratory analysis waste, 200 pounds of oil sorbents, and 200 pounds of cooling tower sludge each year. Overall, wastes would be generated in minimal quantities, recycling efforts would be prioritized wherever practical, and capacity is available in a variety of treatment and disposal facilities. Therefore staff concludes that these added waste quantities generated by SFERP would not result in significant cumulative waste management impacts.

COMPLIANCE WITH LORS

Energy Commission staff concludes that the SFERP would be able to comply with all applicable LORS regulating the management of hazardous and non-hazardous wastes during facility construction and operation. The applicant is required to dispose of hazardous and non-hazardous wastes at facilities approved by the various departments within the California Environmental Protection Agency (CalEPA). Because hazardous wastes would be produced during both project construction and operation, the SFERP project would be required to obtain a hazardous waste generator identification number from the California Department of Toxic Substances Control (DTSC). Accordingly, SFERP would be required to properly store, package and label waste, use only approved transporters, prepare hazardous waste manifests, keep detailed records, and appropriately train employees. Pursuant to California Code of Regulations, Title 22, section 67100.1 et seq., a hazardous waste Source Reduction and Evaluation Review and Plan must be prepared by the SFERP.

RESPONSE TO AGENCY AND PUBLIC COMMENTS

No written comments from the public have been received. The Department of Toxic Substance Control (DTSC) provided minor editorial comments on the original AFC section on waste management.

CONCLUSIONS

Management of the wastes generated during construction and operation of the SFERP project and existing on-site contamination would not result in any significant adverse impacts if the waste management measures proposed in the Amended AFC and the proposed conditions of certification are implemented per the pertinent LORS.

If approved, the applicant would prepare separate Waste Management Plans for the construction and operation of the SFERP, which would include a description of each waste stream and the management methods planed for each waste. Proposed condition

of certification **WASTE-5** ensures that these plans would be submitted to the Compliance Project Manager (CPM) and to applicable local agencies prior to site preparation. Staff believes that the project's compliance with all applicable LORS and the Conditions of Certification proposed by staff would adequately insure that no significant adverse environmental impacts would result from the management and disposal of project-related waste.

Staff has proposed Conditions of Certification **WASTE-1** through **10** which require that: **1**) the project owner have an experienced Registered Professional Engineer or Geologist available for consultation during soil excavation and grading activities in the event that contaminated soils are encountered; **2**) if potentially contaminated soil is unearthed during excavation at either the proposed site or linear facilities, the Registered Professional Engineer or Geologist shall inspect the site, determine the need for sampling nature, file a written report, and seek guidance from the CPM and the appropriate regulatory agencies; **3**) the project owner obtain a unique hazardous waste generator identification number from the Department of Toxic Substances Control (DTSC) in accordance with DTSC regulatory authority; **4**) the project owner notify the CPM whenever the owner becomes aware of any impending waste management-related enforcement action; **5**) the project owner prepare and submit waste management plans for all wastes generated during construction and operation of the facility and submit them to the CPM and the San Francisco Department of Public Health; **6**) that a Phase I ESA be prepared for the wastewater pump station and pipeline; **7**) that a revised human health risk assessment be prepared and the existing Risk Management Plan (RMP), Site Management Plan (SMP), and deed restriction administered by the SFBRWQCB for the neighboring MUNI site be extended to the power plant site; **8**) that site activities involving movement of soils would not commence until the site is adequately characterized and remediated; **9**) that cooling tower sludge be tested; and **10**) that Asbestos Containing Materials be properly removed.

PROPOSED CONDITIONS OF CERTIFICATION

WASTE-1 The project owner shall provide the resume of a Registered Professional Engineer or Geologist, who shall be available for consultation during soil excavation and grading activities, to the Compliance Project Manager (CPM) for review and approval. The resume shall show experience in remedial investigation and feasibility studies.

The Registered Professional Engineer or Geologist shall be given full authority by the project owner to oversee any earth moving activities that have the potential to disturb contaminated soil.

Verification: At least 30 days prior to the start of site mobilization the project owner shall submit the resume to the CPM for review and approval.

WASTE-2 If potentially contaminated soil is unearthed during excavation at either the proposed site or linear facilities as evidenced by discoloration, odor, detection by handheld instruments, or other signs, the Registered Professional Engineer or Geologist shall inspect the site, determine the need for sampling to confirm the nature and extent of contamination, and

file a written report to the project owner and CPM stating the recommended course of action.

Depending on the nature and extent of contamination, the Registered Professional Engineer or Geologist shall have the authority to temporarily suspend construction activity at that location for the protection of workers or the public. If, in the opinion of the Registered Professional Engineer or Geologist, significant remediation may be required, the project owner shall contact representatives of the San Francisco Department of Public Health, the San Francisco Fire Department, and the Berkeley Office of Department of Toxic Substances Control for guidance and possible oversight.

Verification: The project owner shall submit any final reports filed by the Registered Professional Engineer or Geologist to the CPM within 5 days of their receipt. The project owner shall notify the CPM within 24 hours of any orders issued to halt construction.

WASTE-3 The project owner shall obtain a hazardous waste generator identification number from the Department of Toxic Substances Control prior to generating any hazardous waste during both/either construction and/or operations.

Verification: The project owner shall keep its copy of the identification number on file at the project site and notify the CPM via the relevant Monthly Compliance Report of its receipt.

WASTE-4 Upon becoming aware of any impending waste management-related enforcement action by any local, state, or federal authority, the project owner shall notify the CPM of any such action taken or proposed to be taken against the project itself, or against any waste hauler or disposal facility or treatment operator with which the owner contracts.

Verification: The project owner shall notify the CPM in writing within 10 days of becoming aware of an impending enforcement action. The CPM shall notify the project owner of any changes that will be required in the manner in which project-related wastes are managed.

WASTE-5 The project owner shall prepare a Construction Waste Management Plan and an Operation Waste Management Plan for all wastes generated during construction and operation of the facility, respectively, and shall submit both plans to the CPM for review and approval. The plans shall contain, at a minimum, the following:

- A description of all waste streams, including projections of frequency, amounts generated and hazard classifications; and
- Methods of managing each waste, including treatment methods and companies contracted with for treatment services, waste testing methods to assure correct classification, methods of transportation, disposal requirements and sites, and recycling and waste minimization/reduction plans.

Verification: No less than 30 days prior to the start of site mobilization, the project owner shall submit the Construction Waste Management Plan to the CPM for approval.

The Operation Waste Management Plan shall be submitted to the CPM no less than 30 days prior to the start of project operation for approval. The project owner shall submit any required revisions within 20 days of notification by the CPM.

In the Annual Compliance Reports, the project owner shall document the actual waste management methods used during the year and provide a comparison of the actual methods used to those the planned management methods proposed in the original Operation Waste Management Plan.

WASTE-6 The project owner shall prepare a Phase I Environmental Site Assessment (ESA) for the wastewater collection, pumping, and pipeline locations used to convey wastewater to the site.

Verification: At least sixty (60) days prior to commencement of wastewater collection or pipeline construction, the project owner shall provide the Phase I ESA to the San Francisco Department of Public Health for review and comment, and to the CPM for review and approval.

WASTE-7 The project owner shall prepare a revised human health risk assessment addressing soil and groundwater contamination on the site and enter into an agreement with the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) to extend the existing MUNI site Risk Management Plan (RMP), Site Management Plan (SMP), and deed restriction to the power plant site.

Verification: At least sixty (60) days prior to the start of site mobilization, the project owner shall provide: (a) documentation that the existing MUNI site Risk Management Plan (RMP), Site Management Plan (SMP), and deed restriction covers the power plant site and is administered by the SFBRWQCB, and (b) a revised human health risk assessment addressing soil and groundwater contamination on the site to the San Francisco Department of Public Health and SFBRWQCB for review and comment and to the CPM for review and approval.

WASTE-8 The project owner shall ensure that the site is properly characterized and remediated. The project owner shall request review and comment from the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) on the site characterization and the remediation plan. In no event shall any project construction commence that involves either the movement of contaminated soil or construction on contaminated soil until the CPM has determined that all necessary remediation has been accomplished.

Verification: At least thirty (30) days prior to the start of site mobilization, the project owner shall provide documentation that the site has been characterized and remediated following the guidance of the SFRWQCB and that no further action is required. The project owner shall provide a copy of all correspondence with the SFBRWQCB to the CPM within
10 days of submittal. In the event that certain specific site activities need to start prior to

full characterization and remediation, the project owner shall make such a request to the CPM for review and approval.

WASTE-9 The project owner shall ensure that the cooling tower sludge is tested as per 22 CCR 66262.10 and report the findings to the CPM.

Verification: The project shall include the results of sludge testing in a report provided to the CPM. If four consecutive tests show that the sludge is non-hazardous, the project owner may apply to the CPM to discontinue testing.

WASTE-10 The project owner shall ensure that Asbestos Containing Materials (ACM) potentially present on the site will be removed as per Cal/OSHA regulations including 8 CCR 1529, 8 CCR 5208, Department of Toxic Substances Control regulations including Health and Safety Code sections 25914.1-3 and 25915 et seq., and BAAQMD regulation 11-2. Regarding removal of lead containing materials (mostly lead-based paint), the project owner shall ensure that the requirements of 8 CCR 1532.1 and San Francisco Building Code Chapter 34, Section 3407 will be followed.

Verification: At least thirty (30) days prior to the demolition of any structures on the site, the project owner shall provide proof to the CPM that all ACM and Regulated Building Materials have been removed.

REFERENCES

Southeast Water Pollution Control Plant (SEWPCP). 2004. Personal communications with Meei-lih Ahmad, Senior Sanitary Engineer, June 3.

SFERP 2004a - City and County of San Francisco/Blout (tn: 31130). Application for Certification San Francisco Electric Reliability Project - 145-megawatt natural gas-fired peaking power plant located in San Francisco. Submitted to CEC/Therkelsen/Dockets on 3/18/04.

SFERP 2004h - CH2MHill/Carrier (tn: 31274). Attachment to the Data Adequacy Supplement: Attachment WM-DA-1, the Phase I Environmental Site Assessment. Submitted to CEC/Pfanner/Dockets on 4/16/04.

SFERP 2004o – CH2MHill/Carrier (tn: 31856). Data Response Set 1A. Attachment S&W-48, Analytical Results for February 2004 Sampling Event. Submitted to CEC/Pfanner/Dockets on 7/6/04.

SFERP 2004q – CH2MHill/Carrier (tn: 31854). Data Responses Set 1A. Response to Staff's Data Requests dated 6/4/04. Submitted to CEC/Pfanner/Dockets on 7/6/04.

SFPUC 2005a – San Francisco Public Utilities Commission/Hale (tn: 34403). Amendment A of the Application for Certification. Submitted to CEC/Therkelsen/Dockets on 3/25/05.

WORKER SAFETY AND FIRE PROTECTION

Alvin J. Greenberg, Ph.D. and Rick Tyler

SUMMARY OF CONCLUSIONS

Staff concluded that if the applicant for the proposed San Francisco Electric Reliability Project provides a Project Construction Safety and Health Program and a Project Operations and Maintenance Safety and Health Program, as required by Conditions of Certification **WORKER SAFETY -1, -2, -3, -4,** and **-5**, the project would incorporate sufficient measures to ensure adequate levels of industrial safety, and comply with applicable laws, ordinances, regulations, and standards. The proposed conditions of certification provide assurance that the Construction Safety and Health Program and the Operations and Maintenance Safety and Health Program proposed by the applicant will be reviewed by the appropriate agencies before implementation. The conditions also require verification that the proposed plans adequately assure worker safety and fire protection and comply with applicable laws, ordinances, regulations, and standards.

Staff also concludes that the proposed project would not have significant impacts on local fire protection services. The proposed facility would be located within an industrial area that is currently served by the local fire department. The fire risks of the proposed facility do not pose significant added demands on local fire protection services. Staff also finds that the San Francisco Hazmat Team is adequately equipped and staffed to respond to more serious hazardous materials incidents at the proposed facility with an adequate response time.

INTRODUCTION

Worker safety and fire protection is regulated through laws, ordinances, regulations, and standards (LORS), at the federal, state, and local levels. Industrial workers at the facility operate equipment and handle hazardous materials daily and may face hazards that can result in accidents and serious injury. Protection measures are employed to eliminate or reduce these hazards or to minimize the risk through special training, protective equipment and procedural controls.

The purpose of this Preliminary Staff Assessment (PSA) is to assess the worker safety and fire protection measures proposed by the San Francisco Electricity Reliability Project (SFERP) and to determine whether the applicant has proposed adequate measures to:

- comply with applicable safety LORS;
- protect the workers during construction and operation of the facility;
- protect against fire; and
- provide adequate emergency response procedures.

WORKER SAFETY AND FIRE PROTECTION Table 1
Laws, Ordinances, Regulations, and Standards (LORS)

Applicable Law	Description
Federal	
29 U.S. Code sections 651 et seq (Occupational Safety and Health Act of 1970)	This Act mandates safety requirements in the workplace with the purpose of "[assuring] so far as possible every working man and woman in the nation safe and healthful working conditions and to preserve our human resources" (29 USC § 651).
29 CFR sections 1910.1 to 1910.1500 (Occupational Safety and Health Administration Safety and Health Regulations)	These sections define the procedures for promulgating regulations and conducting inspections to implement and enforce safety and health procedures to protect workers, particularly in the industrial sector.
29 CFR sections 1952.170 to 1952.175	These sections provide Federal approval of California's plan for enforcement of its own Safety and Health requirements, in lieu of most of the Federal requirements found in 29 CFR §1910.1 to 1910.1500.
State	
8 CCR section 337, et seq. (Cal/OSHA regulations)	Requires that the Cal/OSHA Standards Board adopt standards at least as effective as the federal standards (Labor Code § 142.3(a)) and thus all Cal/OSHA health and safety standards meet or exceed the Federal requirements.
8 CCR section 339	Contains a list of hazardous chemicals relating to the Hazardous Substance Information and Training Act.
8 CCR section 3221	Requires Fire Prevention Plans.
24 CCR section 3, et seq.	Incorporates the current addition of the Uniform Building Code.
Health and Safety Code section 25500, et seq.	Risk Management Plan requirements for threshold quantity of listed acutely hazardous materials at a facility.
Health and Safety Code sections 25500 to 25541	Requires a Hazardous Material Business Plan detailing emergency response plans for hazardous materials emergency at a facility
Local (or locally enforced)	
1998 Edition of California Fire Code and all applicable NFPA	NFPA standards are incorporated into the California Uniform Fire Code. The fire code contains general provisions for fire safety, including: 1) required road and building access; 2) water supplies; 3) installation of fire protection and life safety systems; 4) fire-

standards (24 CCR Part 9)	resistive construction; 5) general fire safety precautions; 6) storage of combustible materials; 7) exits and emergency escapes; and 8) fire alarm systems. The California Fire Code incorporates current editions of the UFC standards. The City of San Francisco adopted the California Fire Code (CFC) into its municipal code in 1999, and is the administering agency for the CFC standards.
California Building Code Title 24, California Code of Regulations (24 CCR § 3, et seq.)	Comprised of eleven parts containing the building design and construction requirements relating to fire and life safety and structural safety. The California Building Standards Code incorporates current editions of the Uniform Building Code and includes the electrical, mechanical, energy, and fire codes applicable to the project. The Uniform Building Code, the 2001 California Building Standards Code, and the San Francisco Building Code are enforced by the City and County of San Francisco, San Francisco Department of Building Inspection (SFPUC 2005a Sections 8.15.2 and 8.15.6).
Uniform Fire Code, 1997	Contain standards of the American Society for Testing and Materials and the NFPA. It is the United State's premier model fire code. It is updated annually as a supplement and published every third year by the International Fire Code Institute to include all approved code changes in a new edition.

SETTING

Fire support services to the site will be under the jurisdiction of the San Francisco Fire Department (SFFD). The closest SFFD station is No. 25 located at 3305 Third Street, approximately 0.3 miles away with a response time of about 3 to 4 minutes. The second and third closest stations are No. 37 located at 798 Wisconsin Street approximately 1.1 miles away and station No. 9 located at 2245 Jerrold Avenue approximately 1.3 miles away, both with a response time of 3 to 4 minutes (SFPUC 2005a Section 8.8.3.6.2 and Appendix 8.8B, CH2MHill 2004). Each of these stations is staffed with one officer and three firefighters and equipped with one engine. Station No. 9 also has a truck manned by one officer and four firefighters (SFPUC 2005a Section 8.8.3.6.2, Appendix 8.8B, and CH2MHill 2004). All fire fighters at all locations, including the HAZMAT team at Station 36, are trained at the level of Emergency Medical Technician (EMT) -1. In addition, Station 25 has an ambulance and 2 paramedics, Station 37 has a part-time ambulance and paramedics, and Station 9 has an ambulance but no paramedics to staff it at this time.

The San Francisco Hazardous Materials Team located in Station No. 36 at 109 Oak Street approximately 4 miles from the project site is considered first responder for HazMat incidents, with a response time of about 30 minutes. Backup support and technical consultants would be provided by the San Francisco Environmental Health Section of the Department of Public Health. Staff has determined that the hazardous materials response time is adequate and that the SFFD HazMat Response Team is adequately trained and equipped to respond in a timely manner (CCSF 2004).

The SFFD has indicated that Fire Stations No. 25, 37, and 9 are adequately equipped and manned to deal with any incident at the proposed facility. However, the SFFD indicated that their capability to handle fires at the proposed facility could be improved with more training in fighting fires where hazardous materials are present and/or involved (CCSF 2004). Staff finds that this training is part of routine fire department training and therefore will not propose that this be made a condition of certification. Staff determined that the response time is adequate and consistent with the UFC and the NFPA.

WORKER SAFETY AND FIRE PROTECTION Table 1
Equipment and Personnel at SFFD*

SFFD Station	Response Time	Distance to SFERP	Equipment	#of Firefighters per shift	EM Capab ity
Station No. 25 3305 Third Street San Francisco	Approx. 3 to 4 minutes	Approx. 0.3 miles	1 Engine 1 Ambulance	1 Officer 3 Firefighters	EMT-1 Param lic unit
Station No. 37 798 Wisconsin St. San Francisco	Approx. 3 to 4 minutes	Approx. 1.1 miles	1 Engine 1 Part time ambulance	1 Officer 3 Firefighters	EMT-1 Part tir e param lic unit
Station No. 9 2245 Jerrold Ave. San Francisco	Approx. 3 to 4 minutes	Approx. 1.3 miles	1 Engine 1 Fire Truck 1 Ambulance	2 Officers 7 Firefighters	EMT-1
Station No. 36 109 Oak Street San Francisco	Approx. 30 minutes	Approx. 4 miles		Hazmat Team	EMT-1

*Source: SFERP Supplement A to the AFC Section 8.8; information received by e-mail from John Carrier (CH2MHill 2004); and personal communication with SFFD (CCSF 2004).

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

Two issues are assessed in Worker Safety-Fire Protection:

1. The potential for impacts on the safety of workers during demolition, construction, and operations activities, and
2. Fire prevention/protection, emergency medical response, and hazardous materials spill response during demolition, construction, and operations.

Worker safety issues are a matter of adhering to the spirit and intent of the Cal-OSHA regulations. This is essentially a LORS compliance matter and if all LORS are followed, workers will be adequately protected. Thus, the standard for staff's review and determination of significant impacts on workers is whether or not the applicant has demonstrated adequate knowledge about and dedication to implementing all pertinent and relevant Cal-OSHA standards.

Regarding fire prevention matters, staff reviews and evaluates the on-site fire-fighting systems proposed by the applicant and the time needed for off-site local fire departments to respond to a fire, medical, or hazardous material emergency at the proposed power plant site. If on-site systems do not follow established codes and industry standards, staff recommends additional measures. Staff reviews and evaluates the local fire department capabilities in each area, the response time, and interviews the local fire officials to determine if they feel adequately trained, manned, and equipped to respond to the needs of a power plant. Staff then determines if the presence of the power plant would cause a significant impact on a local fire department. If it does, staff will recommend that the applicant mitigate this impact by providing increased resources to the fire department.

DIRECT/INDIRECT IMPACTS AND MITIGATION

Worker Safety

Industrial environments are potentially dangerous during construction and operation of facilities. Workers at the proposed project will be exposed to loud noises, moving equipment, trenches, and confined space entry and egress problems. The workers may experience falls, trips, burns, lacerations, and numerous other injuries. They have the potential to be exposed to falling equipment or structures, chemical spills, hazardous waste, fires, explosions, and electrical sparks and electrocution. It is important for the SFERP to have well-defined policies and procedures, training, and hazard recognition and control at their facility to minimize such hazards and protect workers. If the facility complies with all LORS, workers will be adequately protected from health and safety hazards.

A Safety and Health Program will be prepared by the applicant to minimize worker hazards during construction and operation. Staff uses the phrase "Safety and Health Program" to refer to the measures that will be taken to ensure compliance with the applicable LORS during the construction and operational phases of the project.

Construction Safety and Health Program

The SFERP encompasses construction and operation of a natural gas fired facility. Workers will be exposed to hazards typical of construction and operation of a gas-fired simple cycle facility.

Construction Safety Orders are published at 8 CCR sections 1502, et seq. These requirements are promulgated by Cal/OSHA and are applicable to the construction phase of the project. The Construction Safety and Health Program will include the following:

- Construction Injury and Illness Prevention Program (8 CCR § 1509)
- Construction Fire Prevention Plan (8 CCR § 1920)
- Personal Protective Equipment Program (8 CCR §§ 1514 - 1522)
- Emergency Action Program and Plan

Additional programs under General Industry Safety Orders (8 CCR §§ 3200 to 6184), Electrical Safety Orders (8 CCR §§2299 to 2974) and Unfired Pressure Vessel Safety Orders (8 CCR §§ 450 to 544) will include:

- Electrical Safety Program
- Motor Vehicle and Heavy Equipment Safety Program;
- Forklift Operation Program;
- Excavation/Trenching Program;
- Fall Protection Program;
- Scaffolding/Ladder Safety Program;
- Articulating Boom Platforms Program;
- Crane and Material Handling Program;
- Housekeeping and Material Handling and Storage Program;
- Respiratory Protection Program;
- Employee Exposure Monitoring Program;
- Hand and Portable Power Tool Safety Program;
- Hearing Conservation Program;
- Back Injury Prevention Program;
- Hazard Communication Program;
- Heat and Cold Stress Monitoring and Control Program;
- Pressure Vessel and Pipeline Safety Program;
- Hazardous Waste Program;
- Hot work Safety Program;
- Permit-Required Confined Space Entry Program; and
- Demolition Procedure (if applicable).

The AFC includes adequate outlines of each of the above programs (SFPUC 2005a, Section 8.7.4.3.1). Prior to the start of construction of the SFERP, detailed programs and plans will be provided pursuant to the Condition of Certification **WORKER SAFETY-1**.

Operations and Maintenance Safety and Health Program

Prior to the start of operations at the SFERP, the Operations and Maintenance Safety and Health Program will be prepared. This operational safety program will include the following programs and plans:

- Injury and Illness Prevention Program (8 CCR § 3203);
- Fire Prevention Program (8 CCR § 3221);

- Personal Protective Equipment Program (8 CCR §§ 3401 to 3411); and
- Emergency Action Plan (8 CCR § 3220).

In addition, the requirements under General Industry Safety Orders (8 CCR §§ 3200 to 6184), Electrical Safety Orders (8 CCR §§2299 to 2974) and Unfired Pressure Vessel Safety Orders (8 CCR §§ 450 to 544) will be applicable to the project. Written safety programs for the SFERP, which the applicant will develop, will ensure compliance with the above-mentioned requirements.

The AFC includes adequate outlines of the Injury and Illness Prevention Program, Emergency Action Plan, Fire Prevention Program, and Personal Protective Equipment Program (SFPUC 2005a, Section 8.7.4.3.2). Prior to operation of the SFERP, all detailed programs and plans will be provided pursuant to Condition of Certification **WORKER SAFETY-2**.

Safety and Health Program Elements

As mentioned above, the applicant provided the proposed outlines for both a Construction Safety and Health Program and an Operations Safety and Health Program. The measures in these plans are derived from applicable sections of state and federal law. The major items required in both Safety and Health Programs are as follows:

Injury and Illness Prevention Program (IIPP)

The Applicant will submit expanded Construction and Operations Illness and Injury Prevention Programs to Cal/OSHA for review and comment 30 days prior to construction and operation of the project, respectively.

The IIPP will include the following components as presented in the AFC (SFPUC 2005a Section 8.7.4.3.2):

- identity of person(s) with authority and responsibility for implementing the program;
- establish safety and health policy of the plan;
- define work rules and safe work practices for construction activities;
- system for ensuring that employees comply with safe and healthy work practices;
- system for facilitating employer-employee communications;
- procedures for identifying and evaluating workplace hazards and developing necessary program(s);
- methods for correcting unhealthy/unsafe conditions in a timely manner;
- determine and establish training and instruction requirements and programs; and
- specify safety procedures.

Fire Prevention Plan

California Code of Regulations requires an Operations Fire Prevention Plan (8 CCR § 3221). The AFC outlines a proposed Fire Prevention Plan which is acceptable to staff (SFPUC 2005a Section 8.7.4.3.2). The plan will include the following topics:

- determine general program requirements;
- determine fire hazard inventory, including ignition sources and mitigation;
- develop good housekeeping practices and proper materials storage;
- establish employee alarm and/or communication system(s);
- provide portable fire extinguishers at appropriate site locations;
- locate fixed fire fighting equipment in suitable areas;
- specify fire control requirements and procedures;
- establish proper flammable and combustible liquid storage facilities;
- identify the location and use of flammable and combustible liquids;
- provide proper dispensing and determine disposal requirements for flammable liquids;
- establish and determine training and instruction requirements and programs; and
- identify personnel to contact for information on plan contents.

Staff proposes that the applicant submit a final Fire Prevention Plan to the California Energy Commission Compliance Project Manager (CPM) for review and approval and to the SFFD for review and comment to satisfy proposed Conditions of Certification **WORKER SAFETY-1** and **WORKER SAFETY-2**.

Personal Protective Equipment Program

California regulations require Personal Protective Equipment (PPE) and first aid supplies whenever hazards are present that due to process, environment, chemicals or mechanical irritants, can cause injury or impair bodily function as a result of absorption, inhalation or physical contact (8 CCR sections 3380 to 3400). The SFERP operational environment will require PPE.

All safety equipment must meet National Institute of Safety and Health (NIOSH) or American National Standards Institute (ANSI) standards and will carry markings, numbers, or certificates of approval. Respirators must meet NIOSH and Cal/OSHA standards. Each employee must be provided with the following information pertaining to the protective clothing and equipment:

- proper use, maintenance, and storage;
- when the protective clothing and equipment are to be used;
- benefits and limitations; and
- when and how the protective clothing and equipment are to be replaced.

The PPE Program ensures that employers comply with the applicable requirements for PPE and provides employees with the information and training necessary to protect them from potential workplace hazards.

Emergency Action Plan

California regulations require an Emergency Action Plan (8 CCR § 3220). The AFC contains a satisfactory outline for an emergency action plan (SFPUC 2005a Section 8.7.4.3.2).

The outline lists the following features:

- establish emergency escape procedures and emergency escape route for the facility;
- determine procedures to be followed by employees who remain to operate critical plant operations before they evacuate;
- provide procedures to account for all employees and visitors after emergency evacuation of the plant has been completed;
- specify rescue and medical duties for assigned employees;
- identify fire and emergency reporting procedures to regulatory agencies;
- develop alarm and communication system for the facility;
- establish a list of personnel to contact for information on the plan contents;
- provide emergency response procedures for ammonia release; and
- determine and establish training and instruction requirements and programs.

Written Safety Program

In addition to the specific plans listed above, additional LORS apply to the project, called "safe work practices." Both the Construction and the Operations Safety Programs will address safe work practices under a variety of programs. The components of these programs include, but are not limited to, the programs found under the heading Construction Safety and Health Program on pages 5 and 6:

In addition, the project owner would be required to provide personnel protective equipment and exposure monitoring for workers who are involved in activities on sites where contaminated soil and/or contaminated groundwater exist as per staff's proposed Conditions of Certification **WORKER SAFETY 1** and **2**. In addition, staff's proposed conditions of certification found in the **WASTE MANAGEMENT** section of this staff assessment would require:

- the project owner to prepare a human health risk assessment for the site,
- revise the existing Risk Management Plan (RMP), Site Management Plan (SMP), and deed restriction administered by the SFBRWQCB for the neighboring MUNI site so as to cover the power plant site,
- that site activities involving movement of soils would not commence until the site is adequately characterized and remediated,

- the project owner to have an experienced Registered Professional Engineer or Geologist available for consultation during soil excavation and grading activities in the event that contaminated soils are encountered, and
- if potentially contaminated soil is unearthed during excavation at either the proposed site or linear facilities, the Registered Professional Engineer or Geologist shall inspect the site, determine the need for sampling nature, file a written report, and seek guidance from the CPM and the appropriate regulatory agencies.

These proposed Conditions of Certification would ensure that workers are properly protected from any hazardous wastes presently at the site.

Safety Training Programs

Employees will be trained in the safe work practices described in the above-referenced safety programs.

Additional Mitigation Measures

Protecting construction workers from injury and disease is among the greatest challenges in occupational safety and health. The following facts are reported by the National Institute for Occupational Safety and Health (NIOSH):

- More than 7 million persons work in the construction industry, representing 6% of the labor force. Approximately 1.5 million of these workers are self-employed.
- Of approximately 600,000 construction companies, 90% employ fewer than 20 workers. Few have formal safety and health programs.
- From 1980-1993, an average of 1,079 construction workers were killed on the job each year, more fatal injuries than in any other industry.
- Falls caused 3,859 construction worker fatalities (25.6%) between 1980 and 1993.
- 15% of workers' compensation costs are spent on construction injuries.
- Assuring safety and health in construction is complex, involving short-term work sites, changing hazards, and multiple operations and crews working in close proximity.
- In 1990, Congress directed NIOSH to undertake research and training to reduce diseases and injuries among construction workers in the United States. Under this mandate, NIOSH funds both intramural and extramural research projects.

The hazards associated with the construction industry are thus well documented. These hazards increase in complexity in the multi-employer worksites typical of large complex industrial type projects such as the construction of gas-fired power plants. In order to reduce and/or eliminate these hazards, it has become standard industry practice to hire a Construction Safety Supervisor to ensure a safe and healthful environment for all personnel. This has been evident in the audits of power plants under construction recently conducted by the staff. The Federal Occupational Safety and Health Administration has also entered into strategic alliances with several professional and trade organizations to promote and recognize safety professionals trained as Construction Safety Supervisors, Construction Health and Safety Officers, and other

professional designations. The goal of these partnerships is to encourage construction subcontractors to improve their safety and health performance; to assist them in striving for the elimination of the four hazards (falls, electrical, caught in/between and struck-by hazards), which account for the majority of fatalities and injuries in this industry and have been the focus of targeted OSHA inspections; to prevent serious accidents in the construction industry through implementation of enhanced safety and health programs and increased employee training; and to recognize those subcontractors with exemplary safety and health programs.

To date, there are no OSHA or Cal-OSHA requirements that an employer hire or provide for a Construction Safety Officer. OSHA and Cal-OSHA regulations do, however, require that safety be provided by an employer and the term "Competent Person" is used in many OSHA and Cal-OSHA standards, documents, and directives. A "Competent Person" is usually defined by OSHA as an individual who, by way of training and/or experience, is knowledgeable of standards, is capable of identifying workplace hazards relating to the specific operations, is designated by the employer, and has authority to take appropriate action. Therefore, in order to meet the intent of the OSHA standard to provide for a safe workplace during power plant construction, staff proposes Condition of Certification **WORKER SAFETY-3** which would require the applicant/project owner to designate and provide for a power plant site Construction Safety Supervisor.

As discussed above, the hazards associated with the construction industry are well documented. These hazards increase in complexity in the multi-employer worksites typical of large complex industrial type projects such as the construction of gas-fired power plants.

Accidents, fires, and worker deaths have occurred at Energy Commission-certified power plants in the recent past due to the failure to recognize and control safety hazards and the inability to adequately supervise compliance with occupational safety and health regulations. Safety problems have been documented by Energy Commission staff in safety audits conducted in 2005 at several power plants under construction. The findings of the audit staff include, but are not limited to, such safety oversights as:

- Lack of posted confined space warning placards/signs;
- Confusing and/or inadequate electrical and machinery lockout/tagout permitting and procedures;
- Confusing and/or inappropriate procedures for handing over lockout/tagout and confined space permits from the construction team to commissioning team and then to operations;
- Dangerous placement of hydraulic elevated platforms under each other;
- Inappropriate placement of fire extinguishers near hotwork;
- Dangerous placement of numerous power cords in standing water on the site thus increasing the risk of electrocution;
- Construction of an unsafe aqueous ammonia unloading pad; and

- Inappropriate and unsecure placement of above-ground natural gas pipelines inside the facility but too close to the perimeter fence.
- Lack of adequate employee or contractor written training programs addressing proper procedures to follow in the event of finding suspicious packages or objects either on- or off-site.

In order to reduce and/or eliminate these hazards, it is necessary for the Energy Commission to have a safety professional monitor on-site compliance with Cal-OSHA regulations and periodically audit safety compliance during construction, commissioning, and the hand-over to operational status. These requirements are outlined in Condition of Certification **WORKER SAFETY-4**. A monitor, hired by the project owner yet reporting to the CBO and CPM, will serve as an "extra set of eyes" to ensure that safety procedures and practices are fully implemented at all power plants certified by the Energy Commission. During the audits conducted by staff, most site safety professionals welcomed the audit team and actively engaged them in questions about the team's findings and recommendations. These safety professionals recognized that safety requires continuous vigilance and that the presence of an independent audit team provided a "fresh perspective" of the site.

Fire Hazards

During construction and operation of the proposed SFERP there is the potential for both small fires and major structural fires. Electrical sparks, combustion of fuel oil, natural gas, hydraulic fluid, mineral oil, insulating fluid at the power plant switchyard or flammable liquids, explosions, and over-heated equipment, may cause small fires. Major structural fires in areas without automatic fire detection and suppression systems are unlikely to develop at power plants. Fires and explosions of natural gas or other flammable gasses or liquids are rare. Compliance with all LORS will be adequate to assure protection from all fire hazards.

Staff reviewed the information provided in the AFC and spoke to representatives of the City and the City's Fire Department to determine if available fire protection services and equipment would adequately protect workers, and to determine the project's impact on fire protection services in the area. The project will rely on both onsite fire protection systems and local fire protection services. The onsite fire protection system provides the first line of defense for small fires. In the event of a major fire, fire support services, including trained firefighters and equipment for a sustained response, would be provided by the SFFD (SFPUC 2005a, Section 8.8.3.6.2).

Construction

During construction, portable fire extinguishers will be located throughout the site, and safety procedures and training will be implemented. In addition, the applicant indicated that the City will be notified of any fire incident during construction and will provide fire protection backup for larger fires that can not be extinguished using the portable suppression equipment (SFERP 2004u, WS-115).

Operation

The information in the AFC indicates that the project intends to meet the fire protection and suppression requirements of the California Fire Code, all applicable recommended NFPA standards (including Standard 850 addressing fire protection at electric generating plants), and all Cal-OSHA requirements. Fire suppression elements in the proposed plant will include both fixed and portable fire extinguishing systems. The fire water will be supplied from the City's existing fire water system at a rate of up to 1,500 gpm using SFPUC's Hetch Hetchy Water Supply system, or the City's Auxiliary Water Supply System as needed (SFPUC 2005a Table 8.14-6, and SFERP 2004u WS-116).

A CO_2 fire protection system will be provided for the combustion turbine generators and accessory equipment. The system will have fire detection sensor that will trigger alarms, turn of ventilation, close ventilation openings, and automatically release the CO_2 (SFPUC 2005a, Section 2.3.2.1.1).

In addition to the fixed fire protection system, smoke detectors, flame detectors, temperature detectors, and appropriate class of service portable extinguishers and fire hydrants must be located throughout the facility at code-approved intervals. These systems are standard requirement by the NFPA and the UFC and staff finds that they will ensure adequate fire protection.

The applicant will be required to provide the final Fire Protection and Prevention Program to staff and to the SFFD prior to construction and operation of the project, to confirm the adequacy of the proposed fire protection measures.

Emergency Medical Response

A state-wide survey was conducted by staff to determine the frequency of emergency medical response (EMS) and off-site fire-fighter response for natural gas-fired power plants in California. The purpose of the analysis was to determine what impact, if any, power plants may have on local emergency services. Staff has concluded that incidents at power plants that require fire or EMS response are infrequent and represent an insignificant impact on the local fire departments, except for rare instances where a rural fire department has mostly volunteer fire-fighting staff. However, staff has found that the potential for both work-related and non-work related heart attacks exists at power plants. In fact, staff's research on the frequency of EMS response to gas-fired power plants shows that many of the responses for cardiac emergencies involved non-work related incidences, including visitors. The need for prompt response within a few minutes is well documented in the medical literature. Staff finds that the quickest medical intervention can only be achieved with the use of an on-site defibrillator; the response from an off-site provider would take longer regardless of the provider location. This fact is also well documented and serves as the basis for many private and public locations (e.g., airports, factories, government buildings) maintaining on-site cardiac defibrillation devices. Therefore, staff finds that with the advent of modern cost-effective cardiac defibrillation devises, it is proper in a power plant environment to maintain such a devise on-site in order to convert cardiac arrythmias resulting from industrial accidents or other non-work related causes. Therefore, an additional COC (**WORKER SAFETY-5**) is proposed which would require that a portable automatic cardiac defibrillator be located on site.

CUMULATIVE IMPACTS AND MITIGATION

Staff reviewed the potential for the construction and operation of SFERP combined with existing industrial facilities and expected new facilities to result in impacts on the fire and emergency service capabilities of the SFFD, and found that cumulative impacts were insignificant. The City's fire department stated that they feel adequately staffed and equipped to deal with any incident at the proposed facility (CCSF 2004). Given the industrial area where the project is proposed to be built, and the lack of unique fire hazards associated with a modern gas-fired power plant, staff finds that this project will not have any significant incremental burden on the department's ability to respond to a fire or medical emergency.

RESPONSE TO AGENCY AND PUBLIC COMMENTS

None were received.

CONCLUSIONS

Staff concluded that if the applicant for the proposed SFERP provides a Project Construction Safety and Health Program and a Project Operations and Maintenance Safety and Health Program as required by Conditions of Certification **WORKER SAFETY -1**, and **-2**; and fulfils the requirements of **WORKER SAETY-3** through **5**, the project would incorporate sufficient measures to ensure adequate levels of industrial safety and comply with applicable LORS. Staff also concludes that the proposed project would not have significant impacts on local fire protection services.

PROPOSED CONDITIONS OF CERTIFICATION

WORKER SAFETY-1 The project owner shall submit to the Compliance Project Manager (CPM) a copy of the Project Construction Safety and Health Program containing the following:

- A Construction Personal Protective Equipment Program;
- A Construction Exposure Monitoring Program;
- A Construction Injury and Illness Prevention Program;
- A Construction Emergency Action Plan; and
- A Construction Fire Prevention Plan.

The Personal Protective Equipment Program, the Exposure Monitoring Program, and the Injury and Illness Prevention Program shall be submitted to the CPM for review and approval concerning compliance of the program with all applicable Safety Orders. The Construction Emergency Action Plan and the Fire Prevention Plan shall be submitted to the San Francisco Fire Department for review and comment prior to submittal to the CPM for approval.

Verification: At least 30 days prior to the start of construction, the project owner shall submit to the CPM for review and approval a copy of the Project Construction Safety and Health Program. The project owner shall provide a copy of a letter to the CPM from the San Francisco Fire Department stating that they have reviewed and commented on the Construction Fire Prevention Plan and Emergency Action Plan.

WORKER SAFETY-2 The project owner shall submit to the CPM a copy of the Project Operations and Maintenance Safety and Health Program containing the following:

- An Operation Injury and Illness Prevention Plan;
- An Emergency Action Plan;
- Hazardous Materials Management Program;
- Fire Prevention Program (8 CCR § 3221); and;
- Personal Protective Equipment Program (8 CCR §§ 3401-3411).

The Operation Injury and Illness Prevention Plan, Emergency Action Plan, and Personal Protective Equipment Program shall be submitted to the CPM for review and comment concerning compliance of the program with all applicable Safety Orders. The Operation Fire Prevention Plan and the Emergency Action Plan shall also be submitted to the San Francisco Fire Department for review and comment.

Verification: At least 30 days prior to the start of operation, the project owner shall submit to the CPM for approval a copy of the Project Operations and Maintenance Safety and Health Program. The project owner shall provide a copy of a letter to the CPM from the San Francisco Fire Department stating that they have reviewed and commented to the CPM on the Operations Fire Prevention Plan and Emergency Action Plan.

WORKER SAFETY-3 The project owner shall provide a site Construction Safety Supervisor (CSS) who, by way of training and/or experience, is knowledgeable of power plant construction activities and relevant laws, ordinances, regulations, and standards, is capable of identifying workplace hazards relating to the construction activities, and has authority to take appropriate action to assure compliance and mitigate hazards. The CSS shall:

- Have over-all authority for coordination and implementation of all occupational safety and health practices, policies, and programs;
- Assure that the safety program for the project complies with Cal/OSHA & federal regulations related to power plant projects;
- Assure that all construction and commissioning workers and supervisors receive adequate safety training;
- Complete accident and safety-related incident investigations, emergency response reports for injuries, and inform the CPM of safety-related incidents; and

- Assure that all the plans identified in Worker Safety 1 and 2 are implemented.

Verification: At least 30 days prior to the start of site mobilization, the project owner shall submit to the CPM the name and contact information for the Construction Safety Supervisor (CSS). The contact information of any replacement (CSS) shall be submitted to the CPM within one business day.

The CSS shall submit in the Monthly Compliance Report a monthly safety inspection report to include:

- Record of all employees trained for that month (all records shall be kept on site for the duration of the project);
- Summary report of safety management actions and safety-related incidents that occurred during the month;
- Report of any continuing or unresolved situations and incidents that may pose danger to life or health; and
- Report of accidents and injuries that occurred during the month.

WORKER SAFETY-4 The project owner shall make payments to the Chief Building Official (CBO) for the services of a Safety Monitor based upon a reasonable fee schedule to be negotiated between the project owner and the CBO. Those services shall be in addition to other work performed by the CBO. The Safety Monitor shall be selected by and report directly to the CBO, and will be responsible for verifying that the Construction Safety Supervisor, as required in Worker Safety 3, implements all appropriate Cal/OSHA and Commission safety requirements. The Safety Monitor shall conduct on-site (including linear facilities) safety inspections at intervals necessary to fulfill those responsibilities.

Verification: Prior to the start of construction, the project owner shall provide proof of its agreement to fund the Safety Monitor services to the CPM for review and approval.

WORKER SAFETY-5 The project owner shall ensure that a portable automatic cardiac defibrillator is located on site during construction and operations and shall implement a program to ensure that the equipment is properly maintained and functioning at all times.

At least 30 days prior to the start of site mobilization the project owner shall submit to the CPM proof that a portable automatic cardiac defibrillator exists on site and a copy of the maintenance program for review and approval.

REFERENCES

California Fire Code 1998. Published by the International Fire Code Institute comprised of the International Conference of Building Officials, the Western Fire Chiefs Association, and the California Building Standards Commission. Whittier, Ca.

City and County of San Francisco (CCSF) 2004. Record of conversation with Fire Marshall Paul Chin during a conference call August 3, 2004.

CH2MHill 2004. E-mail received from John Carrier dated August 2, 2004.

SFERP 2004a - City and County of San Francisco/Blout (tn:31130). Application for Certification San Francisco Electric Reliability Project - 145-megawatt natural gas-fired peaking power plant located in San Francisco. Submitted to CEC/Therkelsen/Dockets on 3/18/04.

SFERP 2004u – CH2MHill/Carrier (tn:31948). Informal Data Response Set 1 (Data Responses WS-115, 116, 117, and 118). Submitted to CEC/Pfanner/Dockets on 7/23/04.

SFPUC 2005a – San Francisco Public Utilities Commission/Hale (tn: 34403). Amendment A of the Application for Certification. Submitted to CEC/Therkelsen/Dockets on 3/25/05.

Uniform Fire Code 1997, Vol. 1. Published by the International Fire Code Institute comprised of the International Conference of Building Officials and the Western Fire Chiefs Association, Whittier, Ca.

USOSHA (United States Occupational Safety and Health Administration). 1993. Process Safety Management / Process Safety Management Guidelines For Compliance. U.S. Department of Labor, Washington, DC.

FACILITY DESIGN

Shahab Khoshmashrab, Mark Hesters and Steve Baker

SUMMARY OF CONCLUSIONS

Staff concludes that the design, construction and eventual closure of the project and its linear facilities would likely comply with applicable engineering laws, ordinances, regulations and standards. The proposed conditions of certification, below, would ensure compliance with these laws, ordinances, regulations and standards.

INTRODUCTION

Facility Design encompasses the civil, structural, mechanical and electrical engineering design of the project. The purpose of the Facility Design analysis is to:

- verify that the laws, ordinances, regulations and standards (LORS) applicable to the engineering design and construction of the project have been identified;
- verify that the project and ancillary facilities have been described in sufficient detail, including proposed design criteria and analysis methods, to provide reasonable assurance that the project can be designed and constructed in accordance with all applicable engineering LORS, and in a manner that assures public health and safety;
- determine whether special design features should be considered during final design to deal with conditions unique to the site which could influence public health and safety; and
- describe the design review and construction inspection process and establish conditions of certification that will be used to monitor and ensure compliance with the engineering LORS and any special design requirements.

Subjects discussed in this analysis include:

- Identification of the engineering LORS applicable to facility design;
- Evaluation of the applicant's proposed design criteria, including the identification of those criteria that are essential to ensuring public health and safety;
- Proposed modifications and additions to the Application for Certification (AFC) that are necessary to comply with applicable engineering LORS; and
- Conditions of certification proposed by staff to ensure that the project will be designed and constructed to assure public health and safety and comply with all applicable engineering LORS.

LAWS, ORDINANCES, REGULATIONS AND STANDARDS

Lists of LORS applicable to each engineering discipline (civil, structural, mechanical and electrical) are described in the AFC (SFERP 2004a, Appendices 10-A through 10-G) and are duplicated in Amendment A (SFPUC 2005a, Appendices 10-A through 10-G). Some of these LORS are listed in **Facility Design Table 1** below:

Facility Design Table 1
Some Engineering Laws, Ordinances, Regulations and Standards (LORS)

Applicable LORS	Description
Federal	Title 29 Code of Federal Regulations (CFR), Part 1910, Occupational Safety and Health Standards
State	2001 California Building Standards Code (CBSC) (also known as Title 24, California Code of Regulations)
Local	1997 Uniform Building Code (UBC), Appendix Chapter 16, Division 4
General	American National Standards Institute (ANSI) American Society of Mechanical Engineers (ASME) American Welding Society (AWS) American Society for Testing and Materials (ASTM)

SETTING

The project will be located on an approximately 4-acre site in the Potrero District of the City of San Francisco, County of San Francisco. The site will lie in seismic zone 4. For more information on the site and related project description, please see the **Project Description** section of this document. Additional engineering design details are contained in the AFC (SFERP 2004a, Appendices 10-A through 10-G) and are duplicated in Amendment A (SFPUC 2005a, Appendices 10-A through 10-G).

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

The purpose of this analysis is to ensure that the project is built to the applicable engineering codes in order to ensure public health and life safety. The analysis verifies that the applicable engineering LORS have been identified and that the project and ancillary facilities have been described in sufficient detail. It also evaluates the applicant's proposed design criteria, describes the design review and construction inspection process, and establishes conditions of certification to monitor and ensure compliance with the engineering LORS and any special design requirements. These conditions allow the Energy Commission Compliance Project Manager (CPM) and the applicant to adopt a compliance monitoring scheme that will verify compliance with these LORS.

COMPLIANCE WITH ENGINEERING LAWS, ORDINANCES, REGULATIONS AND STANDARDS

Staff has evaluated the proposed design criteria and construction methods for the project including its linear support facilities such as a natural gas pipeline and electric transmission line. The applicant proposes to use accepted industry standards (see SFPUC 2005a Appendices 10-A through 10-G and SFERP 2004a Appendices 10-A through 10-G for a representative list of applicable industry standards), design practices and construction methods in building the project. Staff concludes that the project, including its linear facilities, would most likely comply with all applicable engineering LORS, and proposes conditions of certification (see below and the **Geology and Paleontology** section of this document) to ensure compliance.

MAJOR STRUCTURES, SYSTEMS AND EQUIPMENT

Major structures, systems and equipment are defined as those structures and associated components or equipment that are necessary for power production and are costly to repair or replace, that require a long lead time to repair or replace, that are used for the storage, containment, or handling of hazardous or toxic materials, or may become potential health and safety hazards if not constructed according to the applicable engineering LORS. Major structures and equipment will be identified through compliance with proposed Condition of Certification **GEN-2** (below).

The AFC contains lists of the civil, structural, mechanical and electrical design criteria that demonstrate the likelihood of compliance with applicable engineering LORS, and that staff believes are essential to ensuring that the project is designed in a manner that protects public health and safety.

The project shall be designed and constructed to the 2001 edition of the California Building Standards Code (CBSC) (also known as Title 24, California Code of Regulations), which encompasses the California Building Code (CBC), California Building Standards Administrative Code, California Electrical Code, California Mechanical Code, California Plumbing Code, California Energy Code, California Fire Code, California Code for Building Conservation, California Reference Standards Code, and other applicable codes and standards in effect at the time design and construction of the project actually commences. In the event the initial designs are submitted to the Chief Building Official (CBO) for review and approval when the successor to the 2001 CBSC is in effect, the 2001 CBSC provisions, identified herein, shall be replaced with the applicable successor provisions.

Certain structures in a power plant may be required, under the CBC, to undergo dynamic lateral force (structural) analysis; others may be designed using the simpler static analysis procedure. In order to ensure that structures are analyzed using the appropriate lateral force procedure, staff has included Condition of Certification **STRUC-1** (below), which in part, requires review and approval by the CBO of the project owner's proposed lateral force procedures prior to the start of construction.

PROJECT QUALITY PROCEDURES

Amendment A (SFPUC 2005a, § 2.4.5) and the AFC (SFERP 2004a, § 2.4.5) describe a project Quality Program that will be used on the project to maximize confidence that systems and components will be designed, fabricated, stored, transported, installed and tested in accordance with the technical codes and standards appropriate for a power plant. Compliance with design requirements will be verified through an appropriate program of inspections and audits. Employment of this quality assurance/quality control (QA/QC) program would ensure that the project is actually designed, procured, fabricated, and installed as contemplated in this analysis.

COMPLIANCE MONITORING

Under Section 104.2 of the CBC, the building official is authorized and directed to enforce all the provisions of the CBC. For all energy facilities certified by the Energy Commission, the Energy Commission is the building official and has the responsibility to enforce the code. In addition, the Energy Commission has the power to render interpretations of the CBC and to adopt and enforce rules and supplemental regulations to clarify the application of the CBC's provisions.

The Energy Commission's design review and construction inspection process is developed to conform to CBC requirements and to ensure that all facility design conditions of certification are met. As provided by Section 104.2.2 of the CBC, the Energy Commission appoints experts to carry out the design review and construction inspections and act as delegate CBO on behalf of the Energy Commission. These delegates typically include the local building official and/or independent consultants hired to cover technical expertise not provided by the local official. The applicant, through permit fees as provided by CBC Sections 107.2 and 107.3, pays the costs of the reviews and inspections. While building permits in addition to the Energy Commission certification are not required for this project, in lieu permit fees are paid by the applicant consistent with CBC Section 107, to cover the costs of reviews and inspections.

Engineering and compliance staff will invite the local building authority, the City and County, or a third party engineering consultant, to act as CBO for the project. When an entity has been identified to perform the duties of CBO, Energy Commission staff will complete a Memorandum of Understanding (MOU) with that entity that outlines its roles and responsibilities and those of its subcontractors and delegates.

Staff has developed proposed conditions of certification to ensure public health and safety and compliance with engineering design LORS. Some of these conditions address the roles, responsibilities and qualifications of the applicant's engineers responsible for the design and construction of the project (proposed Conditions of Certification **GEN-1** through **GEN-8**). Engineers responsible for the design of the civil, structural, mechanical and electrical portions of the project are required to be registered in California, and to sign and stamp each submittal of design plans, calculations and specifications submitted to the CBO. These conditions require that no element of construction subject to CBO review and approval shall proceed without prior approval from the CBO. They also require that qualified special inspectors be assigned to perform or oversee special inspections required by the applicable LORS.

While the Energy Commission and delegate CBO have the authority to allow some flexibility in scheduling construction activities, these conditions are written to require that no element of construction of permanent facilities subject to CBO review and approval, which would be difficult to reverse or correct, may proceed without prior approval of plans by the CBO. Those elements of construction that are not difficult to reverse are allowed to proceed without approval of the plans. The applicant shall bear the responsibility to fully modify those elements of construction to comply with all design changes that result from the CBO's subsequent plan review and approval process.

FACILITY CLOSURE

The removal of a facility from service, or decommissioning, as a result of the project reaching the end of its useful life, may range from "mothballing" to removal of all equipment and appurtenant facilities and restoration of the site. Future conditions that may affect the decommissioning decision are largely unknown at this time.

In order to assure that decommissioning of the facility will be completed in a manner that is environmentally sound, safe and will protect public health and safety, the applicant shall submit a decommissioning plan to the Energy Commission for review and approval prior to the commencement of decommissioning. The plan shall include a discussion of:

- proposed decommissioning activities for the project and all appurtenant facilities constructed as part of the project;
- all applicable LORS, local/regional plans and the conformance of the proposed decommissioning activities to the applicable LORS and local/regional plans;
- the activities necessary to restore the site if the plan requires removal of all equipment and appurtenant facilities; and
- decommissioning alternatives, other than complete site restoration.

The above requirements should serve as adequate protection, even in the unlikely event of project abandonment. Staff has proposed general conditions (see **General Conditions**) to ensure that these measures are included in the Facility Closure plan.

CONCLUSIONS

1. The laws, ordinances, regulations and standards (LORS) identified in the AFC and supporting documents are those applicable to the project.
2. Staff has evaluated the proposed engineering LORS, design criteria and design methods in the record, and concludes that the design, construction and eventual closure of the project are likely to comply with applicable engineering LORS.
3. The conditions of certification proposed will ensure that the facilities can be designed and constructed in accordance with applicable engineering LORS. This will occur through the use of design review, plan checking and field inspections, which are to

be performed by the CBO or other Energy Commission delegate. Staff will audit the CBO to ensure satisfactory performance.

4. Whereas future conditions that may affect decommissioning are largely unknown at this time, it can reasonably be concluded that if the project owner submits a decommissioning plan as required in the **General Conditions** portion of this document prior to the commencement of decommissioning, the decommissioning procedure is likely to occur in compliance with all applicable engineering LORS.

Energy Commission staff recommends that:

1. The conditions of certification proposed herein be adopted to ensure that the project is designed and constructed to assure public health and safety, and to ensure compliance with all applicable engineering LORS;
2. The project be designed and built to the 2001 CBSC (or successor standard, if such is in effect when the initial project engineering designs are submitted for review); and
3. The CBO shall review the final designs, conduct plan checking and perform field inspections during construction. Energy Commission staff shall audit and monitor the CBO to ensure satisfactory performance.

CONDITIONS OF CERTIFICATION

GEN-1 The project owner shall design, construct and inspect the project in accordance with the 2001 California Building Standards Code (CBSC) (also known as Title 24, California Code of Regulations), which encompasses the California Building Code (CBC), California Building Standards Administrative Code, California Electrical Code, California Mechanical Code, California Plumbing Code, California Energy Code, California Fire Code, California Code for Building Conservation, California Reference Standards Code, and all other applicable engineering LORS in effect at the time initial design plans are submitted to the CBO for review and approval. (The CBSC in effect is that edition that has been adopted by the California Building Standards Commission and published at least 180 days previously.) The project owner shall insure that all the provisions of the above applicable codes be enforced during any construction, addition, alteration, moving, demolition, repair, or maintenance of the completed facility [2001 CBC, Section 101.3, Scope]. All transmission facilities (lines, switchyards, switching stations and substations) are handled in Conditions of Certification in the **Transmission System Engineering** section of this document.

In the event that the initial engineering designs are submitted to the CBO when a successor to the 2001 CBSC is in effect, the 2001 CBSC provisions identified herein shall be replaced with the applicable successor provisions. Where, in any specific case, different sections of the code specify different materials, methods of construction or other requirements, the most restrictive shall govern. Where there is a conflict between a general requirement and a specific requirement, the specific requirement shall govern.

The project owner shall insure that all contracts with contractors, subcontractors and suppliers shall clearly specify that all work performed and materials supplied on this project comply with the codes listed above.

Verification: Within 30 days after receipt of the Certificate of Occupancy, the project owner shall submit to the Compliance Project Manager (CPM) a statement of verification, signed by the responsible design engineer, attesting that all designs, construction, installation and inspection requirements of the applicable LORS and the Energy Commission's Decision have been met in the area of facility design. The project owner shall provide the CPM a copy of the Certificate of Occupancy within 30 days of receipt from the CBO [2001 CBC, Section 109 – Certificate of Occupancy].

Once the Certificate of Occupancy has been issued, the project owner shall inform the CPM at least 30 days prior to any construction, addition, alteration, moving, demolition, repair, or maintenance to be performed on any portion(s) of the completed facility which may require CBO approval for the purpose of complying with the above stated codes. The CPM will then determine the necessity of CBO approval on the work to be performed.

GEN-2 Prior to submittal of the initial engineering designs for CBO review, the project owner shall furnish to the CPM and to the CBO a schedule of facility design submittals, a Master Drawing List and a Master Specifications List. The schedule shall contain a list of proposed submittal packages of designs, calculations and specifications for major structures and equipment. To facilitate audits by Energy Commission staff, the project owner shall provide specific packages to the CPM when requested.

Verification: At least 60 days (or project owner and CBO approved alternative timeframe) prior to the start of rough grading, the project owner shall submit to the CBO and to the CPM the schedule, the Master Drawing List and the Master Specifications List of documents to be submitted to the CBO for review and approval. These documents shall be the pertinent design documents for the major structures and equipment listed in **Facility Design Table 2** below. Major structures and equipment shall be added to or deleted from the table only with CPM approval. The project owner shall provide schedule updates in the Monthly Compliance Report.

Facility Design Table 2
Major Structures and Equipment List

Equipment/System	Quantity (Plant)
Combustion Turbine (CT) Foundation and Connections	3
CT Generator Foundation and Connections	3
SCR Stack Structure, Foundation and Connections	3
CT Main Transformer Foundation and Connections	3
CT Fire Protection Skid Foundation and Connections	3
Sprint System Skid Foundation and Connetctions	3
NOx Water Injection Skid Foundation and Connections	3
SCR/CO Catalyst System Structure, Foundation and Connections	3
CEMS Structure, Foundation and Connections	3

Equipment/System	Quantity (Plant)
Chiller/Cooling Tower Package Foundation and Connections	1
Auxiliary Cooling Pumps Foundation and Connections	2
Cooling Tower Chemical System Foundation and Connections	1
Administration/Control Room/Plant Operations Building Structure, Foundation and Connections	1
Plant Air Compressor Package Foundation and Connections	1
Bulk Caustic Storage (if required) Foundation and Connections	1
Bulk Acid Storage (if required) Foundation and Connections	1
Bulk Sodium Hypochlorite Tank Structure, Foundation and Connections	1
EDI Train Foundation and Connections	2
EDI Feed Pump Skid Foundation and Connections	1
RO Clean in Place Skid Foundation and Connections	1
RO Feed Pump Skid Foundation and Connections	1
RO Train Foundation and Connections	1
RO Cartridge Filters Foundation and Connections	1
Ultra Filtration System Waste Skid Foundation and Connections	1
Ultra Filtration System Trains Foundation and Connections	2
Ultra Filtration System Pump Skid Foundation and Connections	1
Air Blowers Foundation and Connections	2
Chemical Metering System Foundation and Connections	1
Equalization Tank Structure, Foundation and Connections	1
Bio Reactor Structure, Foundation and Connections	1
Ultra Filtration Permeate Tank Structure, Foundation and Connections	1
Aqueous Ammonia Forwarding Pumps Foundation and Connections	2
Aqueous Ammonia Storage Tank Structure, Foundation and Connections	1
RO Permeate Tank Structure, Foundation and Connections	1
Treated Water Pumps Foundation and Connections	2
Treated Water Storage Tank Structure, Foundation and Connections	1
Oil/Water Separator Foundation and Connections	1
Waste Water Sump and Lift Station Foundation and Connections	1
DI Water Pumps Foundation and Connections	2
DI Water Storage Tank Structure, Foundation and Connections	1
Turbine Wash Water Drain Tank Structure, Foundation and Connections	1
Natural Gas Inlet Scrubber	1
Hydrocarbon Drain Tank Structure, Foundation and Connections	1
Discharge Filter Scrubbers Foundation and Connections	2
Fuel Gas Compressors Foundation and Connections	4
Fuel Gas Cooling Radiators Foundation and Connections	4
Natural Gas Metering Station Foundation and Connections	1
Hydrocarbon Drain Tank Foundation and Connections	1

Equipment/System	Quantity (Plant)
13.8kV/115kV GSUs Foundation and Connections	3
Auxiliary Transformers Foundation and Connections	2
Fire Blast Walls Structure, Foundation and Connections	3
Switchgears Structure, Foundation and Connections	2
Station Service Transformer Foundation and Connections	4
Retaining Wall Structure, Foundation and Connections	1
Reclaimed Water Treatment Building Structure, Foundation and Connections	1
Supplemental Aeration Blowers Foundation and Connections	2
Membrane Air Scour Blowers Foundation and Connections	2
Drain Pump Foundation and Connections	1
Permeate Pumps Foundation and Connections	2
Mixed Liquor Recirculation Pumps Foundation and Connections	2
CIP/Backpulse Pumps Foundation and Connections	2
CIP/Backpulse Tank Structure, Foundation and Connections	1
DIP Tank Recirculation/Drain Pumps Foundation and Connections	2
DIP Tank Structure, Foundation and Connections	2
Membrane Tanks Structure, Foundation and Connections	2
Feed Channel Structure, Foundation and Connections	1
Combined Inlet System Structure, Foundation and Connections	1
Potable Water Systems	1 Lot
Drainage Systems (including sanitary drain and waste)	1 Lot
High Pressure and Large Diameter Piping and Pipe Racks	1 Lot
HVAC and Refrigeration Systems	1 Lot
Temperature Control and Ventilation Systems (including water and sewer connections)	1 Lot
Building Energy Conservation Systems	1 Lot
Switchyard, Buses and Towers	1 Lot
Electrical Duct Banks	1 Lot

GEN-3 The project owner shall make payments to the CBO for design review, plan check and construction inspection based upon a reasonable fee schedule to be negotiated between the project owner and the CBO. These fees may be consistent with the fees listed in the 2001 CBC [Chapter 1, Section 107 and Table 1-A, Building Permit Fees; Appendix Chapter 33, Section 3310 and Table A-33-A, Grading Plan Review Fees; and Table A-33-B, Grading Permit Fees], adjusted for inflation and other appropriate adjustments; may be based on the value of the facilities reviewed; may be based on hourly rates; or may be as otherwise agreed by the project owner and the CBO.

Verification: The project owner shall make the required payments to the CBO in accordance with the agreement between the project owner and the CBO. The project owner shall send a copy of the CBO's receipt of payment to the CPM in the next Monthly Compliance Report indicating that the applicable fees have been paid.

GEN-4 Prior to the start of rough grading, the project owner shall assign a California registered architect, structural engineer or civil engineer, as a resident engineer (RE), to be in general responsible charge of the project [Building Standards Administrative Code (Cal. Code Regs., tit. 24, § 4-209, Designation of Responsibilities)]. All transmission facilities (lines, switchyards, switching stations and substations) are handled in Conditions of Certification in the **Transmission System Engineering** section of this document.

The RE may delegate responsibility for portions of the project to othe registered engineers. Registered mechanical and electrical engineers may be delegated responsibility for mechanical and electrical portions of the project respectively. A project may be divided into parts, provided each part is clearly defined as a distinct unit. Separate assignment of general responsible charge may be made for each designated part.

The RE shall:

1. Monitor construction progress of work requiring CBO design review and inspection to ensure compliance with LORS;
2. Ensure that construction of all the facilities subject to CBO design review and inspection conforms in every material respect to the applicable LORS, these conditions of certification, approved plans, and specifications;
3. Prepare documents to initiate changes in the approved drawings and specifications when directed by the project owner or as required by conditions on the project;
4. Be responsible for providing the project inspectors and testing agency(ies) with complete and up-to-date set(s) of stamped drawings, plans, specifications and any other required documents;
5. Be responsible for the timely submittal of construction progress reports to the CBO from the project inspectors, the contractor, and other engineers who have been delegated responsibility for portions of the project; and
6. Be responsible for notifying the CBO of corrective action or the disposition of items noted on laboratory reports or other tests as not conforming to the approved plans and specifications.

The RE shall have the authority to halt construction and to require changes o remedial work, if the work does not conform to applicable requirements.

If the RE or the delegated engineers are reassigned or replaced, the projec owner shall submit the name, qualifications and registration number of the newly assigned engineer to the CBO for review and approval. The projec owner shall notify the CPM of the CBO's approval of the new engineer.

Verification: At least 30 days (or project owner and CBO approved alternative timeframe) prior to the start of rough grading, the project owner shall submit to the CBO for review and approval, the resume and registration number of the RE and any other delegated engineers assigned to the project. The project owner shall notify the CPM of

the CBO's approvals of the RE and other delegated engineer(s) within five days of the approval.

If the RE or the delegated engineer(s) are subsequently reassigned or replaced, the project owner has five days in which to submit the resume and registration number of the newly assigned engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer within five days of the approval.

GEN-5 Prior to the start of rough grading, the project owner shall assign at least one of each of the following California registered engineers to the project: A) a civil engineer; B) a soils engineer, or a geotechnical engineer or a civil engineer experienced and knowledgeable in the practice of soils engineering; and C) an engineering geologist. Prior to the start of construction, the project owner shall assign at least one of each of the following California registered engineers to the project: D) a design engineer, who is either a structural engineer or a civil engineer fully competent and proficient in the design of power plant structures and equipment supports; E) a mechanical engineer; and F) an electrical engineer. [California Business and Professions Code section 6704 et seq., and sections 6730, 6731 and 6736 requires state registration to practice as a civil engineer or structural engineer in California.] All transmission facilities (lines, switchyards, switching stations and substations) are handled in Conditions of Certification in the **Transmission System Engineering** section of this document.

The tasks performed by the civil, mechanical, electrical or design engineers may be divided between two or more engineers, as long as each engineer is responsible for a particular segment of the project (e.g., proposed earthwork, civil structures, power plant structures, equipment support). No segment of the project shall have more than one responsible engineer. The transmission line may be the responsibility of a separate California registered electrical engineer.

The project owner shall submit to the CBO for review and approval, the names, qualifications and registration numbers of all responsible engineers assigned to the project [2001 CBC, Section 104.2, Powers and Duties of Building Official].

If any one of the designated responsible engineers is subsequently reassigned or replaced, the project owner shall submit the name, qualifications and registration number of the newly assigned responsible engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer.

A. The civil engineer shall:

1. Review the Foundation Investigations Report, Geotechnical Report or Soils Report prepared by the soils engineer, the geotechnical engineer, or by a civil engineer experienced and knowledgeable in the practice of soils engineering;

2. Design, or be responsible for design, stamp, and sign all plans, calculations and specifications for proposed site work, civil works and related facilities requiring design review and inspection by the CBO. At a minimum, these include: grading, site preparation, excavation, compaction, construction of secondary containment, foundations, erosion and sedimentation control structures, drainage facilities, underground utilities, culverts, site access roads and sanitary sewer systems; and
3. Provide consultation to the RE during the construction phase of the project and recommend changes in the design of the civil works facilities and changes in the construction procedures.

B. The soils engineer, geotechnical engineer, or civil engineer experienced and knowledgeable in the practice of soils engineering, shall:

1. Review all the engineering geology reports;
2. Prepare the Foundation Investigations Report, Geotechnical Report or Soils Report containing field exploration reports, laboratory tests and engineering analysis detailing the nature and extent of the soils that may be susceptible to liquefaction, rapid settlement or collapse when saturated under load [2001 CBC, Appendix Chapter 33, Section 3309.5, Soils Engineering Report; Section 3309.6, Engineering Geology Report; and Chapter 18, Section 1804, Foundation Investigations];
3. Be present, as required, during site grading and earthwork to provide consultation and monitor compliance with the requirements set forth in the 2001 CBC, Appendix Chapter 33; Section 3317, Grading Inspections (depending on the site conditions, this may be the responsibility of either the soils engineer or engineering geologist or both); and
4. Recommend field changes to the civil engineer and RE.

This engineer shall be authorized to halt earthwork and to require changes if site conditions are unsafe or do not conform with predicted conditions used as a basis for design of earthwork or foundations [2001 CBC, section 104.2.4, Stop orders].

C. The engineering geologist shall:

1. Review all the engineering geology reports and prepare final soils grading report; and
2. Be present, as required, during site grading and earthwork to provide consultation and monitor compliance with the requirements set forth in the 2001 CBC, Appendix Chapter 33; Section 3317, Grading Inspections (depending on the site conditions, this may be the responsibility of either the soils engineer or engineering geologist or both).

D. The design engineer shall:

1. Be directly responsible for the design of the proposed structures and equipment supports;
2. Provide consultation to the RE during design and construction of the project;
3. Monitor construction progress to ensure compliance with engineering LORS;
4. Evaluate and recommend necessary changes in design; and
5. Prepare and sign all major building plans, specifications and calculations.

E. The mechanical engineer shall be responsible for, and sign and stamp a statement with, each mechanical submittal to the CBO, stating that the proposed final design plans, specifications, and calculations conform with all of the mechanical engineering design requirements set forth in the Energy Commission's Decision.

F. The electrical engineer shall:

1. Be responsible for the electrical design of the project; and
2. Sign and stamp electrical design drawings, plans, specifications, and calculations.

Verification: At least 30 days (or project owner and CBO approved alternative timeframe) prior to the start of rough grading, the project owner shall submit to the CBO for review and approval, resumes and registration numbers of the responsible civil engineer, soils (geotechnical) engineer and engineering geologist assigned to the project.

At least 30 days (or project owner and CBO approved alternative timeframe) prior to the start of construction, the project owner shall submit to the CBO for review and approval, resumes and registration numbers of the responsible design engineer, mechanical engineer and electrical engineer assigned to the project.

The project owner shall notify the CPM of the CBO's approvals of the responsible engineers within five days of the approval.

If the designated responsible engineer is subsequently reassigned or replaced, the project owner has five days in which to submit the resume and registration number of the newly assigned engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer within five days of the approval.

GEN-6 Prior to the start of an activity requiring special inspection, the project owner shall assign to the project, qualified and certified special inspector(s) who shall be responsible for the special inspections required by the 2001 CBC,

Chapter 17 [Section 1701, Special Inspections; Section 1701.5, Type of Work (requiring special inspection)]; and Section 106.3.5, Inspection and observation program. All transmission facilities (lines, switchyards, switching stations and substations) are handled in Conditions of Certification in the **Transmission System Engineering** section of this document.

The special inspector shall:

1. Be a qualified person who shall demonstrate competence, to the satisfaction of the CBO, for inspection of the particular type of construction requiring special or continuous inspection;
2. Observe the work assigned for conformance with the approved design drawings and specifications;
3. Furnish inspection reports to the CBO and RE. All discrepancies shall be brought to the immediate attention of the RE for correction, then, if uncorrected, to the CBO and the CPM for corrective action [2001 CBC, Chapter 17, Section 1701.3, Duties and Responsibilities of the Special Inspector]; and
4. Submit a final signed report to the RE, CBO, and CPM, stating whether the work requiring special inspection was, to the best of the inspector's knowledge, in conformance with the approved plans and specifications and the applicable provisions of the applicable edition of the CBC.

   A certified weld inspector, certified by the American Welding Society (AWS), and/or ASME as applicable, shall inspect welding performed on-site requiring special inspection (including structural, piping, tanks and pressure vessels).

Verification: At least 15 days (or project owner and CBO approved alternative timeframe) prior to the start of an activity requiring special inspection, the project owner shall submit to the CBO for review and approval, with a copy to the CPM, the name(s) and qualifications of the certified weld inspector(s), or other certified special inspector(s) assigned to the project to perform one or more of the duties set forth above. The project owner shall also submit to the CPM a copy of the CBO's approval of the qualifications of all special inspectors in the next Monthly Compliance Report.

If the special inspector is subsequently reassigned or replaced, the project owner has five days in which to submit the name and qualifications of the newly assigned special inspector to the CBO for approval. The project owner shall notify the CPM of the CBO's approval of the newly assigned inspector within five days of the approval.

GEN-7 If any discrepancy in design and/or construction is discovered in any engineering work that has undergone CBO design review and approval, the project owner shall document the discrepancy and recommend the corrective action required [2001 CBC, Chapter 1, Section 108.4, Approval Required; Chapter 17, Section 1701.3, Duties and Responsibilities of the Special Inspector; Appendix Chapter 33, Section 3317.7, Notification of Noncompliance]. The discrepancy documentation shall be submitted to the CBO for review and approval. The discrepancy documentation shall reference

this Condition of Certification and, if appropriate, the applicable sections of the CBC and/or other LORS.

Verification: The project owner shall transmit a copy of the CBO's approval of any corrective action taken to resolve a discrepancy to the CPM in the next Monthly Compliance Report. If any corrective action is disapproved, the project owner shall advise the CPM, within five days, of the reason for disapproval and the revised corrective action to obtain CBO's approval.

GEN-8 The project owner shall obtain the CBO's final approval of all completed work that has undergone CBO design review and approval. The project owner shall request the CBO to inspect the completed structure and review the submitted documents. The project owner shall notify the CPM after obtaining the CBO's final approval. The project owner shall retain one set of approved engineering plans, specifications and calculations (including all approved changes) at the project site or at another accessible location during the operating life of the project [2001 CBC, Section 106.4.2, Retention of Plans]. Electronic copies of the approved plans, specifications, calculations and marked-up as-builts shall be provided to the CBO for retention by the CPM.

Verification: Within 15 days of the completion of any work, the project owner shall submit to the CBO, with a copy to the CPM, in the next Monthly Compliance Report, (a) a written notice that the completed work is ready for final inspection, and (b) a signed statement that the work conforms to the final approved plans. After storing final approved engineering plans, specifications and calculations as described above, the project owner shall submit to the CPM a letter stating that the above documents have been stored and indicate the storage location of such documents.

Within 90 days of the completion of construction, the project owner shall provide to the CBO three sets of electronic copies of the above documents at the project owner's expense. These are to be provided in the form of "read only" adobe .pdf 6.0 files, with restricted printing privileges (i.e. password protected), on archive quality compact discs.

CIVIL-1 The project owner shall submit to the CBO for review and approval the following:

1. Design of the proposed drainage structures and the grading plan;
2. An erosion and sedimentation control plan;
3. Related calculations and specifications, signed and stamped by the responsible civil engineer; and
4. Soils Report, Geotechnical Report or Foundation Investigations Report required by the 2001 CBC [Appendix Chapter 33, Section 3309.5, Soils Engineering Report; Section 3309.6, Engineering Geology Report; and Chapter 18, Section 1804, Foundation Investigations].

Verification: At least 15 days (or project owner and CBO approved alternative timeframe) prior to the start of site grading the project owner shall submit the documents described above to the CBO for design review and approval. In the next Monthly

Compliance Report following the CBO's approval, the project owner shall submit a written statement certifying that the documents have been approved by the CBO.

CIVIL-2 The resident engineer shall, if appropriate, stop all earthwork and construction in the affected areas when the responsible soils engineer, geotechnical engineer, or the civil engineer experienced and knowledgeable in the practice of soils engineering identifies unforeseen adverse soil or geologic conditions. The project owner shall submit modified plans, specifications and calculations to the CBO based on these new conditions. The project owner shall obtain approval from the CBO before resuming earthwork and construction in the affected area [2001 CBC, Section 104.2.4, Stop orders].

Verification: The project owner shall notify the CPM within 24 hours, when earthwork and construction is stopped as a result of unforeseen adverse geologic/soil conditions. Within 24 hours of the CBO's approval to resume earthwork and construction in the affected areas, the project owner shall provide to the CPM a copy of the CBO's approval.

CIVIL-3 The project owner shall perform inspections in accordance with the 2001 CBC, Chapter 1, Section 108, Inspections; Chapter 17, Section 1701.6, Continuous and Periodic Special Inspection; and Appendix Chapter 33, Section 3317, Grading Inspection. All plant site-grading operations, for which a grading permit is required, shall be subject to inspection by the CBO.

If, in the course of inspection, it is discovered that the work is not being performed in accordance with the approved plans, the discrepancies shall be reported immediately to the resident engineer, the CBO and the CPM [2001 CBC, Appendix Chapter 33, Section 3317.7, Notification of Noncompliance]. The project owner shall prepare a written report, with copies to the CBO and the CPM, detailing all discrepancies, non-compliance items, and the proposed corrective action.

Verification: Within five days of the discovery of any discrepancies, the resident engineer shall transmit to the CBO and the CPM a Non-Conformance Report (NCR), and the proposed corrective action for review and approval. Within five days of resolution of the NCR, the project owner shall submit the details of the corrective action to the CBO and the CPM. A list of NCRs, for the reporting month, shall also be included in the following Monthly Compliance Report.

CIVIL-4 After completion of finished grading and erosion and sedimentation control and drainage work, the project owner shall obtain the CBO's approval of the final grading plans (including final changes) for the erosion and sedimentation control work. The civil engineer shall state that the work within his/her area of responsibility was done in accordance with the final approved plans [1998 CBC, Section 3318, Completion of Work].

Verification: Within 30 days (or project owner and CBO approved alternative timeframe) of the completion of the erosion and sediment control mitigation and drainage work, the project owner shall submit to the CBO, for review and approval, the final grading plans (including final changes) and the responsible civil engineer's signed

statement that the installation of the facilities and all erosion control measures were completed in accordance with the final approved combined grading plans, and that the facilities are adequate for their intended purposes, with a copy of the transmittal letter to the CPM. The project owner shall submit a copy of the CBO's approval to the CPM in the next Monthly Compliance Report.

STRUC-1 Prior to the start of any increment of construction of any major structure or component listed in **Facility Design Table 2** of Condition of Certification **GEN-2**, above, the project owner shall submit to the CBO for design review and approval the proposed lateral force procedures for project structures and the applicable designs, plans and drawings for project structures. Proposed lateral force procedures, designs, plans and drawings shall be those for the following items (from **Table 2**, above):

1. Major project structures;
2. Major foundations, equipment supports and anchorage;
3. Large field fabricated tanks;
4. Turbine/generator pedestal; and

Construction of any structure or component shall not commence until the CBO has approved the lateral force procedures to be employed in designing that structure or component.

The project owner shall:

1. Obtain approval from the CBO of lateral force procedures proposed for project structures;
2. Obtain approval from the CBO for the final design plans, specifications, calculations, soils reports and applicable quality control procedures. If there are conflicting requirements, the more stringent shall govern (i.e., highest loads, or lowest allowable stresses shall govern). All plans, calculations and specifications for foundations that support structures shall be filed concurrently with the structure plans, calculations and specifications [2001 CBC, Section 108.4, Approval Required];
3. Submit to the CBO the required number of copies of the structural plans, specifications, calculations and other required documents of the designated major structures prior to the start of on-site fabrication and installation of each structure, equipment support, or foundation [2001 CBC, Section 106.4.2, Retention of plans; and Section 106.3.2, Submittal documents];
4. Ensure that the final plans, calculations and specifications clearly reflect the inclusion of approved criteria, assumptions and methods used to develop the design. The final designs, plans, calculations and specifications shall be signed and stamped by the responsible design engineer [2001 CBC, Section 106.3.4, Architect or Engineer of Record]; and

5. Submit to the CBO the responsible design engineer's signed statement that the final design plans conform to the applicable LORS [2001 CBC, Section 106.3.4, Architect or Engineer of Record].

Verification: At least 60 days (or project owner and CBO approved alternative timeframe) prior to the start of any increment of construction of any structure or component listed in **Facility Design Table 2** of Condition of Certification **GEN-2** above, the project owner shall submit to the CBO the above final design plans, specifications and calculations, with a copy of the transmittal letter to the CPM.

The project owner shall submit to the CPM, in the next Monthly Compliance Report a copy of a statement from the CBO that the proposed structural plans, specifications and calculations have been approved and are in compliance with the requirements set forth in the applicable engineering LORS.

STRUC-2 The project owner shall submit to the CBO the required number of sets of the following documents related to work that has undergone CBO design review and approval:

1. Concrete cylinder strength test reports (including date of testing, date sample taken, design concrete strength, tested cylinder strength, age of test, type and size of sample, location and quantity of concrete placement from which sample was taken, and mix design designation and parameters);
2. Concrete pour sign-off sheets;
3. Bolt torque inspection reports (including location of test, date, bolt size, and recorded torques);
4. Field weld inspection reports (including type of weld, location of weld, inspection of non-destructive testing procedure and results, welder qualifications, certifications, qualified procedure description or number (ref: AWS); and
5. Reports covering other structural activities requiring special inspections shall be in accordance with the 2001 CBC, Chapter 17, Section 1701, Special Inspections; Section 1701.5, Type of Work (requiring special inspection); Section 1702, Structural Observation and Section 1703, Nondestructive Testing.

Verification: If a discrepancy is discovered in any of the above data, the project owner shall, within five days, prepare and submit an NCR describing the nature of the discrepancies and the proposed corrective action to the CBO, with a copy of the transmittal letter to the CPM [2001 CBC, Chapter 17, Section 1701.3, Duties and Responsibilities of the Special Inspector]. The NCR shall reference the Condition(s) of Certification and the applicable CBC chapter and section. Within five days of resolution of the NCR, the project owner shall submit a copy of the corrective action to the CBO and the CPM.

The project owner shall transmit a copy of the CBO's approval or disapproval of the corrective action to the CPM within 15 days. If disapproved, the project owner shall advise the CPM, within five days, the reason for disapproval, and the revised corrective action to obtain CBO's approval.

STRUC-3 The project owner shall submit to the CBO design changes to the final plans required by the 2001 CBC, Chapter 1, Section 106.3.2, Submittal documents and Section 106.3.3, Information on plans and specifications, including the revised drawings, specifications, calculations, and a complete description of, and supporting rationale for, the proposed changes, and shall give to the CBO prior notice of the intended filing.

Verification: On a schedule suitable to the CBO, the project owner shall notify the CBO of the intended filing of design changes, and shall submit the required number of sets of revised drawings and the required number of copies of the other above-mentioned documents to the CBO, with a copy of the transmittal letter to the CPM. The project owner shall notify the CPM, via the Monthly Compliance Report, when the CBO has approved the revised plans.

STRUC-4 Tanks and vessels containing quantities of toxic or hazardous materials exceeding amounts specified in Chapter 3, Table 3-E of the 2001 CBC shall, at a minimum, be designed to comply with the requirements of that Chapter.

Verification: At least 30 days (or project owner and CBO approved alternate timeframe) prior to the start of installation of the tanks or vessels containing the above specified quantities of toxic or hazardous materials, the project owner shall submit to the CBO for design review and approval final design plans, specifications and calculations, including a copy of the signed and stamped engineer's certification.

The project owner shall send copies of the CBO approvals of plan checks to the CPM in the following Monthly Compliance Report. The project owner shall also transmit a copy of the CBO's inspection approvals to the CPM in the Monthly Compliance Report following completion of any inspection.

MECH-1 The project owner shall submit, for CBO design review and approval, the proposed final design, specifications and calculations for each plant major piping and plumbing system listed in **Facility Design Table 2**, Condition of Certification **GEN-2**, above. Physical layout drawings and drawings not related to code compliance and life safety need not be submitted. The submittal shall also include the applicable QA/QC procedures. Upon completion of construction of any such major piping or plumbing system, the project owner shall request the CBO's inspection approval of said construction [2001 CBC, Section 106.3.2, Submittal Documents; Section 108.3, Inspection Requests; Section 108.4, Approval Required; 2001 California Plumbing Code, Section 103.5.4, Inspection Request; Section 301.1.1, Approval].

The responsible mechanical engineer shall stamp and sign all plans, drawings and calculations for the major piping and plumbing systems subject

to the CBO design review and approval, and submit a signed statement to the CBO when the said proposed piping and plumbing systems have been designed, fabricated and installed in accordance with all of the applicable laws, ordinances, regulations and industry standards [Section 106.3.4, Architect or Engineer of Record], which may include, but not be limited to:

- American National Standards Institute (ANSI) B31.1 (Power Piping Code);
- ANSI B31.2 (Fuel Gas Piping Code);
- ANSI B31.3 (Chemical Plant and Petroleum Refinery Piping Code);
- ANSI B31.8 (Gas Transmission and Distribution Piping Code);
- Title 24, California Code of Regulations, Part 5 (California Plumbing Code);
- Title 24, California Code of Regulations, Part 6 (California Energy Code, for building energy conservation systems and temperature control and ventilation systems);
- Title 24, California Code of Regulations, Part 2 (California Building Code); and
- Specific City/County code.

The CBO may deputize inspectors to carry out the functions of the code enforcement agency [2001 CBC, Section 104.2.2, Deputies].

Verification: At least 30 days (or project owner and CBO approved alternative timeframe) prior to the start of any increment of major piping or plumbing construction listed in **Facility Design Table 2**, Condition of Certification **GEN-2** above, the project owner shall submit to the CBO for design review and approval the final plans, specifications and calculations, including a copy of the signed and stamped statement from the responsible mechanical engineer certifying compliance with the applicable LORS, and shall send the CPM a copy of the transmittal letter in the next Monthly Compliance Report.

The project owner shall transmit to the CPM, in the Monthly Compliance Report following completion of any inspection, a copy of the transmittal letter conveying the CBO's inspection approvals.

MECH-2 For all pressure vessels installed in the plant, the project owner shall submit to the CBO and California Occupational Safety and Health Administration (Cal-OSHA), prior to operation, the code certification papers and other documents required by the applicable LORS. Upon completion of the installation of any pressure vessel, the project owner shall request the appropriate CBO and/or Cal-OSHA inspection of said installation [2001 CBC, Section 108.3, Inspection Requests].

The project owner shall:

1. Ensure that all boilers and fired and unfired pressure vessels are designed, fabricated and installed in accordance with the appropriate

section of the ASME Boiler and Pressure Vessel Code, or other applicable code. Vendor certification, with identification of applicable code, shall be submitted for prefabricated vessels and tanks; and

2. Have the responsible design engineer submit a statement to the CBO that the proposed final design plans, specifications and calculations conform to all of the requirements set forth in the appropriate ASME Boiler and Pressure Vessel Code or other applicable codes.

Verification: At least 30 days (or project owner and CBO approved alternative timeframe) prior to the start of on-site fabrication or installation of any pressure vessel, the project owner shall submit to the CBO for design review and approval, the above listed documents, including a copy of the signed and stamped engineer's certification, with a copy of the transmittal letter to the CPM.

The project owner shall transmit to the CPM, in the Monthly Compliance Report following completion of any inspection, a copy of the transmittal letter conveying the CBO's and/or Cal-OSHA inspection approvals.

MECH-3 The project owner shall submit to the CBO for design review and approval the design plans, specifications, calculations and quality control procedures for any heating, ventilating, air conditioning (HVAC) or refrigeration system. Packaged HVAC systems, where used, shall be identified with the appropriate manufacturer's data sheets.

The project owner shall design and install all HVAC and refrigeration systems within buildings and related structures in accordance with the CBC and other applicable codes. Upon completion of any increment of construction, the project owner shall request the CBO's inspection and approval of said construction. The final plans, specifications and calculations shall include approved criteria, assumptions and methods used to develop the design. In addition, the responsible mechanical engineer shall sign and stamp all plans, drawings and calculations and submit a signed statement to the CBO that the proposed final design plans, specifications and calculations conform with the applicable LORS [2001 CBC, Section 108.7, Other Inspections; Section 106.3.4, Architect or Engineer of Record].

Verification: At least 30 days (or project owner and CBO approved alternative timeframe) prior to the start of construction of any HVAC or refrigeration system, the project owner shall submit to the CBO the required HVAC and refrigeration calculations, plans and specifications, including a copy of the signed and stamped statement from the responsible mechanical engineer certifying compliance with the CBC and other applicable codes, with a copy of the transmittal letter to the CPM.

ELEC-1 Prior to the start of any increment of electrical construction for electrical equipment and systems 480 volts and higher, listed below, with the exception of underground duct work and any physical layout drawings and drawings not related to code compliance and life safety, the project owner shall submit, for CBO design review and approval, the proposed final

design, specifications and calculations [CBC 2001, Section 106.3.2, Submittal documents]. Upon approval, the above listed plans, together with design changes and design change notices, shall remain on the site or at another accessible location for the operating life of the project. The project owner shall request that the CBO inspect the installation to ensure compliance with the requirements of applicable LORS [2001 CBC, Section 108.4, Approval Required, and Section 108.3, Inspection Requests]. All transmission facilities (lines, switchyards, switching stations and substations) are handled in Conditions of Certification in the **Transmission System Engineering** section of this document.

A. Final plant design plans to include:

   1. one-line diagrams for the 13.8 kV, 4.16 kV and 480 V systems; and
   2. system grounding drawings.

B. Final plant calculations to establish:

   1. short-circuit ratings of plant equipment;
   2. ampacity of feeder cables;
   3. voltage drop in feeder cables;
   4. system grounding requirements;
   5. coordination study calculations for fuses, circuit breakers and protective relay settings for the 13.8 kV, 4.16 kV and 480 V systems;
   6. system grounding requirements; and
   7. lighting energy calculations.

C. The following activities shall be reported to the CPM in the Monthly Compliance Report:

   1. Receipt or delay of major electrical equipment;
   2. Testing or energization of major electrical equipment; and
   3. A signed statement by the registered electrical engineer certifying that the proposed final design plans and specifications conform to requirements set forth in the Energy Commission Decision.

Verification: At least 30 days (or project owner and CBO approved alternative timeframe) prior to the start of each increment of electrical construction, the project owner shall submit to the CBO for design review and approval the above listed documents. The project owner shall include in this submittal a copy of the signed and stamped statement from the responsible electrical engineer attesting compliance with the applicable LORS, and shall send the CPM a copy of the transmittal letter in the next Monthly Compliance Report.

REFERENCES

SFERP 2004a — City and County of San Francisco/Blount (tn: 31130). Application for Certification, San Francisco Electric Reliability Project — 145 megawatt natural gas-fired peaking power plant located in San Francisco. Submitted to CEC/Therkelsen/Dockets on 3/18/04.

SFPUC 2005a — San Francisco Public Utilities Commission/Hale (tn: 34403). Amendment A of the Application for Certification. Submitted to CEC/Therkelsen/Dockets on 3/25/05.

GEOLOGY AND PALEONTOLOGY

Patrick Pilling, Ph.D., P.E., G.E.

SUMMARY OF CONCLUSIONS

With the exception of strong ground shaking, potential liquefaction during an earthquake, and potential differential settlement of heavily loaded structures, the San Francisco Electric Reliability Project site lies in an area that generally exhibits low geologic hazards and no known viable geologic or mineralogic resources. Strong ground shaking, potential liquefaction, and potential differential settlement must be mitigated through foundation design as required by the California Building Code (2001) and conditions of certification. Paleontological Resources have been documented in the general area of the project. The potential impacts to paleontological resources due to construction activities will be mitigated as required by conditions of certification.

Based on this information, it is staff's opinion that the potential for significant adverse cumulative impacts to the project from geologic hazards can be mitigated to less than significant, and the potential for significant adverse cumulative impacts to potential geologic, mineralogic, and paleontologic resources from the construction, operation, and closure of the proposed project, is low. It is Energy Commission staff's opinion that the San Francisco Electric Reliability Project can be designed and constructed in accordance with all applicable laws, ordinances, regulations, and standards and in a manner that protects environmental quality and assures public health and safety.

INTRODUCTION

In this section, Energy Commission staff discusses potential impacts of the proposed San Francisco Electric Reliability Project (SFERP) regarding geologic hazards, geologic (including mineralogic), and paleontologic resources. Staff's objective is to ensure that there will be no significant adverse impacts to significant geological and paleontological resources during project construction, operation, and closure. A brief geological and paleontological overview of the project is provided. The section concludes with staff's proposed monitoring and mitigation measures with respect to geologic hazards and geologic, mineralogic, and paleontologic resources, with the inclusion of conditions of certification.

LAWS, ORDINANCES, REGULATION, AND STANDARDS

The applicable laws, ordinances, regulation and standards (LORS) are listed in the Application for Certification (AFC), in Section 8.15.2, Table 8.15-1, Section 8.16.2, and Table 8.16-1 (SFPUC 2005a). The following is a brief description of the LORS for geologic hazards and resources, and mineralogic and paleontologic resources.

Geology and Paleontology Table 1
Laws, Ordinances, Regulations, and Standards

Applicable Law	Description
Federal	The proposed SFERP is not located on federal land. There are no Federal LORS for geologic hazards and resources for this site.
State	
California Building Standards Code (CBSC), 2001 [particularly Part 2, California Building Code (CBC)]	The CBC includes a series of standards that are used in project investigation, design and construction (including grading and erosion control).
Local	None
Standard of Practice - Society for Vertebrate Paleontology (SVP), 1995	The "Measures for Assessment and Mitigation of Adverse Impacts to Non-renewable Paleontologic Resources: Standard Procedures" is a set of procedures and standards for assessing and mitigating impacts to vertebrate paleontological resources. The measures were adopted in October 1995 by the SVP, a national organization of professional scientists.

SETTING

The proposed SFERP site is a 4-acre parcel owned by the City of San Francisco near Potrero Point in San Francisco. The site is located north of the Islais Creek Channel between Cesar Chavez Street and 25th Street.

REGIONAL SETTING

The project site is located along the eastern side of the San Francisco Peninsula, near the San Francisco Bay and north of the Isais Creek Channel within the limits of the Potrero District. The San Francisco Peninsula lies within the northern Coast Ranges physiographic province. This province is characterized by a northwest-trending series o elongated ranges and narrow valleys and extends from the Oregon border to the Transverse Ranges in Southern California (Norris and Webb, 1990).

Potrero Point lies within the Hunters Point Shear Zone. This shear zone is an older structure that trends northwest across the peninsula and is part of the Coast Range Thrust Fault that juxtaposed the Franciscan Formation and Great Valley Sequence. The California Division of Mines and Geology (CDMG, 1994) considers the shear zone inactive. No known active faults cross the SFERP site.

Potrero Point was originally a spur of Potrero Hill, a serpentine bedrock rock mass of the Franciscan Formation that rose to a height of over 100 feet. During the 19th century the bay and tidelands immediately adjacent to Potrero Point were reclaimed, in part, with rock quarried from Potrero Point (Mace, 2002).

PROJECT SITE DESCRIPTION

The project site is relatively level and consists of reclaimed tidal flats. The site is immediately underlain by artificial fill, older alluvial deposits and Franciscan-age bedrock. Although a detailed geotechnical investigation has not yet been performed for this site, the thickness of the artificial fill materials most likely varies from as little as 3 feet to in excess of 30 feet (SFPUC, 2005). The fill material is expected to consist of generally loose to isolated zones of medium dense materials that contain rubble and debris (e.g. bricks, concrete, wood, and re-worked bedrock). Although the artificial fill could contain fossils since it is typically comprised of sediments from older deposits, any such fossils would lack stratigraphic context such that they would only have very limited scientific and educational value.

The alluvial deposits that overlay the Franciscan bedrock in this area generally consist of clayey sands, sands with gravel, and sandy clays. These materials were derived from topographic highs in the vicinity of the site, and have been dated as early Pleistocene to Holocene in age. Bay mud also overlies the bedrock and is associated with estuarine deposits. These materials, in particular the late Pleistocene and early Holocene sediments, have produced numerous significant plant, invertebrate, and vertebrate fossils at previously recorded fossil sites and, as a result, have a high potential for additional similar fossils to be uncovered by excavations for project construction.

The Franciscan bedrock is primarily composed of serpentine, with occasional tectonic blocks of sandstones and shales. This unit has been dated as Jurassic, Cretaceous, and early Tertiary in age. The serpentine is generally moderately to highly weathered in the upper few feet, and becomes less weathered and very dense at depth. This formation is considered to have a low potential for containing fossils only because there is the possibility that excavations could encounter blocks of fossil-bearing sedimentary rock (SFERP, 2005c).

Ground water is expected to be present at depths that vary between 5 and 7 feet below existing grade.

Based on the information contained in the AFC (SFERP, 2005c) and local geologic maps, artificial fill materials and underlying sediments and bedrock are anticipated along the proposed process water supply pipeline, underground electrical, and natural gas pipeline alignments. Ground water is most likely present at elevations similar to those discussed above.

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

There are two types of impacts considered in this section. The first are geologic hazards, which could impact proper functioning of the proposed facility and include faulting and seismicity, liquefaction, dynamic compaction, hydrocompaction, subsidence, expansive soils, landslides, and tsunamis and seiches. The second considers potential impacts the proposed facility could have on existing geologic, mineralogic, and paleontologic resources in the area.

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE

No federal LORS with respect to geologic hazards and geologic and mineralogic resources apply to this project; however, the CBSC and CBC provide geotechnical and geological investigation and design guidelines, which engineers must adhere to when designing a proposed facility. As a result, the criteria used to assess geologic hazard impact significance includes evaluating each potential hazard in relation to being able to adequately design and construct the proposed facility.

The California Environmental Quality Act (CEQA) Guidelines, Appendix G, provides a checklist of questions that a lead agency should normally address if relevant to a project's environmental impacts.

- Section (V) (c) asks if the project will directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
- Sections (VI) (a), (b), (c), (d), and (e) pose questions that are focused on whether or not the project would expose persons or structures to geologic hazards.
- Sections (X) (a) and (b) pose questions about the project's effect on mineral resources.

With respect to impacts the proposed facility may have on existing geologic and mineralogic resources, geologic and mineral resource maps for the surrounding area have been reviewed, in addition to any site-specific information provided by the applicant, to determine if geologic and mineralogic resources are present in the area. When available, operating procedures of the proposed facility, in particular ground water extraction and mass grading, are reviewed to determine if such operations could adversely impact such resources.

Staff reviewed existing paleontologic information for the surrounding area, as well as any site-specific information provided by the applicant, in accordance with accepted assessment protocol (SVP, 1995) to determine if there are any known paleontologic resources in the general area. If present or likely to exist, conditions of certification are applied to the project approval, which outlines procedures required during construction to mitigate impacts to potential resources.

DIRECT/INDIRECT IMPACTS AND MITIGATION

Seismicity and associated liquefaction, as well as potential differential settlement of heavily loaded structures, represent the main geologic hazards at this site. These potential hazards can be effectively mitigated through facility design. Conditions of Certification **GEN-1, GEN-5,** and **CIVIL-1** in the **Facility Design** section and **GEO-1** below should mitigate these impacts to a less than significant level.

No viable geologic or mineralogic resources are known to exist in the area. Paleontological resources have been documented within 1 mile of the project site, and the native materials exhibit a high sensitivity rating with respect to containing significant paleontologic resources. Since the proposed project will include significant amounts of grading, foundation excavation, and utility trenching, staff considers the probability that paleontological resources will be encountered during such activities to be high when

native materials are encountered, based on SVP assessment criteria. Conditions of Certification **PAL-1** to **PAL-7** are designed to mitigate any paleontological resource impacts, as discussed above, to a less than significant level.

GEOLOGICAL HAZARDS

The AFC provides documentation of potential geologic hazards at the SFERP plant site, in addition to subsurface exploration information on the adjacent property to the west of the subject site (SFERP, 2005c). Review of the AFC, coupled with our independent research, indicates that potential geologic hazards at this site can be mitigated to less than significant as long as the proposed conditions of certification are followed.

Our independent research included review of available geologic maps, reports, and related data of the SFERP plant site. Geological information was available from the California Geological Survey (CGS), CDMG, U.S. Geological Survey (USGS), and other governmental organizations.

Faulting and Seismicity

Energy Commission staff reviewed the CGS publication *Fault Activity Map of California and Adjacent Areas with Locations and Ages of Recent Volcanic Eruptions*, dated 1994 (CGS, 1994); the *Simplified Fault Activity Map of California* (Jennings and Saucedo, 2002); the *Maps of Known Active Fault Near-Source Zones in California and Adjacent Parts of Nevada* (International Conference of Building Officials [ICBO], 1998), the *Quaternary Geologic Map of the San Francisco Bay* (Wahrhaftig et al., 1993); the *Geologic Map of the San Francisco-San Jose Quadrangle* (Wagner et al., 1990); *Seismic Shaking Hazard Maps of California* (Petersen et al., 1999); *Probabilistic Seismic Hazard Assessment for the State of California* (CDMG, 1996a); and *Peak Acceleration from Maximum Credible Earthquakes in California (Rock and Stiff Soil Sites)* (CDMG, 1992). No active or potentially active faults are known to cross the power plant footprint or its associated linear facilities. The project is located within seismic Zone 4 as delineated on Figure 16-2 of the 2001 edition of the CBC.

The closest known active fault is the San Andreas Fault, which is located approximately 13 kilometers west of the project site. This fault is designated a class "A" fault under the CBC (a fault with a maximum magnitude earthquake greater than 7 and a slip rate in excess of 5 mm/year). The maximum moment magnitude earthquake, defined as the largest earthquake that a given fault is considered capable of generating, for the segment of San Andreas Fault closest to the project is a moment magnitude 7.9 event. The slip rate for this section of the San Andreas Fault is 24 mm/year (ICBO 1998, Table 1). A mean peak horizontal bedrock acceleration for this fault is estimated to be 60 percent of the acceleration due to gravity (0.60g), while the peak horizontal ground surface acceleration is estimated to be 0.55g at the site (SFPUC, 2005a). These values are generally consistent with the CGS Map Sheet 48, which predicts a peak ground acceleration with a 10 percent chance of exceedance in 50 years of between 0.5g and 0.6g for the project area. Strong ground shaking can be mitigated to less than significant through facility design as required by Condition of Certification **GEN-1**, **GEN-5**, and **CIVIL-1** in the **Facility Design** section.

Since no active faults are known to exist within the limits of the SFERP site, the potential for surface rupture at the site is considered low.

Liquefaction

Liquefaction is a condition in which a cohesionless soil loses its shear strength due to a sudden increase in pore water pressure. The soils most prone to liquefaction during earthquakes are submerged fine-grained, poorly graded, sands and silts. The *2001 Seismic Hazard Map for the City and County of San Francisco* (CDMG, 2000) and the *Preliminary Maps of Quaternary Deposits and Liquefaction Susceptibility, Nine-County San Francisco Bay Region, California* (USGS, 2000) indicates that the plant site and the proposed project linear facilities are located in a liquefaction hazard zone.

Information contained in the AFC (SFPUC, 2005a) indicates that ground water is present at relatively shallow depths and that the deeper fill areas present at the site exhibit a high potential for liquefaction. Such conditions may also exist in the proposed project linear facility areas.

Based on the above information, the site can be characterized as having a high potential for liquefaction during a large earthquake; however, this potential impact can be mitigated to less than significant through facility design as required by Conditions of Certification **GEN-1**, **GEN-5**, and **CIVIL-1** in the **Facility Design** section and **GEO-1** below. Due to the heterogeneous character of the fill, potentially liquefiable soils are expected to occur as zones or pockets, rather than as horizontally or vertically continuous layers. The potential for liquefaction-induced lateral spreading within the fill is considered low due to low surface gradients at the project site, the heterogeneous nature of the fill, and the lateral confinement present immediately around the site.

Dynamic Compaction

Dynamic compaction of soils results when relatively unconsolidated granular materials experience vibration associated with seismic events. The vibration causes a decrease in soil volume, as the soil grains tend to rearrange into a more dense state (an increase in soil density). The decrease in volume can result in settlement of overlying structural improvements.

Based on the information contained in the AFC (SFERP, 2005c), the potential for localized areas of dynamic compaction is considered high for the site and associated project linear facilities that pass through artificial fill materials; however, this potential impact can be mitigated to less than significant through facility design as required by Condition of Certification **GEN-1**, **GEN-5**, and **CIVIL-1** in the **Facility Design** section and **GEO-1** below.

Hydrocompaction

Partially saturated soils can possess bonds that are a result of chemical precipitates that accumulate under semi-arid conditions. Such soluble compound bonds provide the soils with cohesion and rigidity; however, these bonds can be destroyed upon prolonged submergence. When destroyed, a substantial decrease in the material's void ratio is experienced even though the vertical pressure does not change. Materials that exhibit this decrease in void ratio and corresponding decrease in volume with the addition of

water are defined as collapsible soils. Collapsible soils are typically limited to true loess, clayey loose sands, loose sands cemented by soluble salts, and windblown silts. Since the plant site and proposed linear facilities are generally underlain by granular soils with a relatively shallow ground water table, the potential for hydrocompaction of site soils is considered low.

Subsidence

Ground subsidence is typically caused when ground water is drawn down by irrigation activities such that the effective unit weight of the soil mass is increased, which in turn increases the effective stress on the underlying soils. This results in consolidation/settlement of the underlying soils. The SFERP will obtain process water from the City of San Francisco via a new water pumping station. As such, drawdown of the water table due to SFERP operations is not anticipated. Therefore, the potential for ground subsidence is considered low.

Due to the varying thickness and density of the artificial fill that mantles the entire site, differential settlement of this material due to conventional foundation surcharge loads could be excessive. As a result, design of the heavier structures at this site will most likely require the use of ground improvement techniques or deep foundations bearing on the underlying native serpentine bedrock to minimize any differential settlement to acceptable levels.

Expansive Soils

Soil expansion occurs when clay-rich soils, with an affinity for water, exist in-place at a moisture content below their plastic limit. The addition of moisture from irrigation, capillary tension, water line breaks, etc. causes the clay soils to collect water molecules in their structure, which in turn causes an increase in the overall volume of the soil. This increase in volume can correspond to movement of overlying structural improvements. Surface materials present at the project site are expected to consist of granular fill materials overlying bedrock. Such materials are not prone to excessive expansion. Only thin, localized areas of surface clay soils would be expected. As a result, the potential for expansive soils to impact the project facilities is considered low.

Landslides

Landslides typically involve rotational slump failures within surficial soils/colluvium and/or weakened bedrock that are usually implemented by an increase of the material's moisture content above a layer, which exhibits a low strength. Debris flows are shallow landslides that travel downslope very rapidly as muddy slurry. The SFERP is relatively flat, exhibiting slopes on the order of 1 to 2 percent. As a result, the potential impact of landslides and debris flows to the SFERP is low.

Tsunamis and Seiches

Tsunamis and seiches are earthquake-induced waves, which inundate low-lying areas adjacent to large bodies of water. The proposed SFERP site is located on the east side of the San Francisco peninsula; it is not in the direct path of any potential tsunami waves. As a result, the potential for tsunamis to affect the operation of the facility is considered low.

The anticipated finish grade of the site will be approximately 15 to 20 feet above mean sea level. An earthquake on one of the local faults could generate a seiche wave in the adjacent bay, but such waves are typically less than this height. As a result, the potential for a seiche wave to impact the operation of the facility is considered low.

GEOLOGIC, MINERALOGIC, AND PALEONTOLOGIC RESOURCES

Energy Commission staff have reviewed applicable geologic maps and reports for this area (Wahrhaftig et al., 1993; Wagner et al., 1990; CDMG, 1978; California Department of Conservation, 2001; CDMG, 1990; CDMG, 1999; CGS, 2002; CDMG, 1998; CDMG, 1986; and CDMG, 1996b. Based on this review and the information contained in the AFC (SFPUC, 2005a), there are no known viable geologic or mineralogic resources located at or immediately adjacent to the proposed SFERP site. The power plant footprint and the majority of the proposed linear facility routes are located in mineral resource zone (MRZ) MRZ-1, while portions of the proposed underground electrical and process water line routes are within MRZ-4. The MRZ-1 designation means that there are no known mineralogical resources, while the MRZ-4 designation indicates an area where available information is inadequate for assignment to any other MRZ zone. The only potential mineral resource in the vicinity of the project site is construction aggregate generated from the serpentine bedrock; however, this is not a viable resource since the site and surrounding area have been developed, the amount of potential aggregate would be very limited for such a small site, ground water is present at shallow depths, and the potential resource is covered by artificial fill.

A paleontologic resources field survey has not been performed for this site, but previous studies (SFERP2004a) for sites in the immediate vicinity of the project area have been completed. Based on existing literature, a sensitivity analysis has been performed for the SFERP site. Several documented vertebrate fossil sites are present within 1 mile of the project site. Although the artificial fill that underlies the site and the areas proposed to host the proposed project linear routes could contain fossils since it is typically comprised of sediments from older deposits, any such fossils would lack stratigraphic context such that they would only have very limited scientific and educational value.

However, the underlying late Pleistocene to early Holocene sediments have produced numerous significant plant, invertebrate, and vertebrate fossils at previously recorded fossil sites and, as a result, have a high potential for additional similar fossils to be uncovered by excavations for project construction. The materials associated with the underlying Franciscan formation is considered to have a low potential for containing fossils only because there is the possibility that excavations could encounter blocks of fossil-bearing sedimentary rock (SFERP, 2005c). Based on this information and staff's review of available information, the proposed SFERP site has a high potential to contain significant paleontological resources when native materials are encountered during grading, foundation, and trenching activities.

Construction Impacts and Mitigation

As noted above, no viable geologic or mineralogic resources are known to exist in the area. Paleontological resources have been documented with 1 mile of the project site, and the native materials exhibit a high sensitivity rating with respect to containing significant paleontologic resources. Since construction of the proposed project will

include significant amounts of grading, foundation excavation, and utility trenching, staff considers the probability that paleontological resources will be encountered during such activities to be high when native materials are encountered, based on SVP assessment criteria. Conditions of Certification **PAL-1** to **PAL-7** are designed to mitigate any paleontological resource impacts, as discussed above, to a less than significant level.

Operation Impacts and Mitigation

Operation of the proposed facility should not have any adverse impact on geologic, mineralogic, or paleontologic resources.

CUMULATIVE IMPACTS AND MITIGATION

With the exception of strong ground shaking and the potential liquefaction during an earthquake, as well as potential differential settlement of heavily loaded structures, the SFERP site lies in an area that generally exhibits low geologic hazards and no known viable geologic or mineralogic resources. Strong ground shaking, potential liquefaction, and potential differential settlement must be mitigated through foundation design as required by the CBC, Conditions of Certification **GEN-1**, **GEN-5**, and **CIVIL-1** in the **Facility Design** section, and **GEO-1**. Paleontological resources have been documented in the general area of the project. The potential impacts to paleontological resources due to construction activities will be mitigated as required by Conditions of Certification **PAL-1** to **PAL-7.**

Based on this information, it is staff's opinion that the potential for significant adverse cumulative impacts to the project from geologic hazards can be mitigated to less than significant, and that the potential for significant adverse cumulative impacts to potential geologic, mineralogic, and paleontologic resources from the proposed project, is low.

Based upon the literature and archives search, field surveys and the preliminary geotechnical investigation for the project, the applicant has proposed monitoring and mitigation measures to be followed during the construction of the power plant and associated linear facilities. Energy Commission staff agree with the applicant that the facility can be designed and constructed to minimize the effect of geologic hazards at the site, and that impacts to vertebrate fossils encountered during construction of the power plant and associated linear facilities would be mitigated to a level of insignificance.

The proposed conditions of certification are to allow the Energy Commission Compliance Project Manager (CPM) and the applicant to adopt a compliance monitoring scheme that will ensure compliance with LORS applicable to geologic hazards, and geologic, mineralogic, and paleontologic resources.

FACILITY CLOSURE

A definition and general approach to closure is presented in the General Conditions section of this assessment. Facility closure activities are not anticipated to impact geologic, mineralogic, or paleontologic resources. This is due to the fact that no such resources are known to exist at the power plant location or along its proposed linear facilities. In addition, decommissioning and closure of the power plant should not

negatively affect geologic, mineralogic, or paleontologic resources since the majority of the ground disturbed in plant decommissioning and closure would have been disturbed during construction and operation of the facility.

RESPONSE TO AGENCY AND PUBLIC COMMENTS

No comments on geology and paleontology have been received for the SFERP project.

CONCLUSIONS

The applicant will likely be able to comply with applicable LORS, provided that the proposed conditions of certification are followed. The project should have no adverse impact with respect to design and construction of the project, and geologic, mineralogic, and paleontologic resources. Staff proposes to ensure compliance with applicable LORS through the adoption of the proposed conditions of certification listed below.

PROPOSED CONDITIONS OF CERTIFICATION

General conditions of certification with respect to Geology are covered under Conditions of Certification **GEN-1**, **GEN-5**, and **CIVIL-1** in the **Facility Design** section, and include **GEO-1** below. Paleontological conditions of certification also follow.

GEO-1 The Soils Engineering Report required by the 2001 CBC Appendix Chapter 33, Section 3309.5 Soils Engineering Report, should specifically include data regarding the liquefaction potential and dynamic compaction potential of the site soils. The liquefaction analysis shall be implemented by following the recommended procedures contained in *Recommended Procedures for Implementation of California Division of Mines and Geology Special Publication 117, Guidelines for Analyzing and Mitigating Liquefaction Hazards in California* dated March 1999.

The project owner shall include in the application for a grading permit a copy of the Soils Engineering Report which describes the liquefaction and dynamic compaction potential of the site foundation soils and a summary of how the results of the analyses were incorporated into the project foundation design and grading plan for review and comment by the Chief Building Official (CBO). A copy of the Soils Engineering Report, application for grading permit and any comments by the CBO are to be provided to the CPM at least 30 days prior to grading.

PAL-1 The project owner shall provide the Compliance Project Manager (CPM) with the resume and qualifications of its Paleontological Resource Specialist (PRS) for review and approval. If the approved PRS is replaced prior to completion of project mitigation and submittal of the Paleontological Resources Report, the project owner shall obtain CPM approval of the replacement PRS. The project owner shall submit to the CPM to keep on file,

resumes of the qualified Paleontological Resource Monitors (PRMs). If a PRM is replaced, the resume of the replacement PRM shall also be provided to the CPM.

The PRS resume shall include the names and phone numbers of references. The resume shall also demonstrate to the satisfaction of the CPM, the appropriate education and experience to accomplish the required paleontological resource tasks.

As determined by the CPM, the PRS shall meet the minimum qualifications for a vertebrate paleontologist as described in the Society of Vertebrate Paleontology (SVP) guidelines of 1995. The experience of the PRS shall include the following:

1. institutional affiliations, appropriate credentials and college degree,
2. ability to recognize and collect fossils in the field;
3. local geological and biostratigraphic expertise;
4. proficiency in identifying vertebrate and invertebrate fossils and;
5. at least three years of paleontological resource mitigation and field experience in California, and at least one year of experience leading paleontological resource mitigation and field activities.

The project owner shall ensure that the PRS obtains qualified paleontological resource monitors to monitor as he or she deems necessary on the project. Paleontologic resource monitors (PRMs) shall have the equivalent of the following qualifications:

- BS or BA degree in geology or paleontology and one year experience monitoring in California; or
- AS or AA in geology, paleontology or biology and four years experience monitoring in California; or
- Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in California.

Verification: (1) At least 60 days prior to the start of ground disturbance, the project owner shall submit a resume and statement of availability of its designated PRS for on-site work.

2) At least 20 days prior to ground disturbance, the PRS or project owner shall provide a letter with resumes naming anticipated monitors for the project and stating that the identified monitors meet the minimum qualifications for paleontological resource monitoring required by the condition. If additional monitors are obtained during the project, the PRS shall provide additional letters and resumes to the CPM. The letter shall be provided to the CPM no later than one week prior to the monitor beginning on-site duties.

(3) Prior to the termination or release of a PRS, the project owner shall submit the resume of the proposed new PRS to the CPM for review and approval.

PAL-2 The project owner shall provide to the PRS and the CPM, for approval, maps and drawings showing the footprint of the power plant, construction laydown areas, and all related facilities. Maps shall identify all areas of the project where ground disturbance is anticipated. If the PRS requests enlargements or strip maps for linear facility routes, the project owner shall provide copies to the PRS and CPM. The site grading plan and the plan and profile drawings for the utility lines would be acceptable for this purpose. The plan drawings should show the location, depth, and extent of all ground disturbances and can be at a scale of 1 inch = 40 feet to 1 inch = 100 feet range. If the footprint of the power plant or linear facility changes, the project owner shall provide maps and drawings reflecting these changes to the PRS and CPM.

If construction of the project will proceed in phases, maps and drawings may be submitted prior to the start of each phase. A letter identifying the proposed schedule of each project phase shall be provided to the PRS and CPM. Prior to work commencing on affected phases, the project owner shall notify the PRS and CPM of any construction phase scheduling changes.

At a minimum, the project owner shall ensure that the PRS or PRM consults weekly with the project superintendent or construction field manager to confirm area(s) to be worked during the next week, until ground disturbance is completed.

Verification: (1) At least 30 days prior to the start of ground disturbance, the project owner shall provide the maps and drawings to the PRS and CPM.

(2) If there are changes to the footprint of the project, revised maps and drawings shall be provided to the PRS and CPM at least 15 days prior to the start of ground disturbance.

(3) If there are changes to the scheduling of the construction phases, the project owner shall submit a letter to the CPM within 5 days of identifying the changes.

PAL-3 The project owner shall ensure that the PRS prepares, and the project owner submits to the CPM for review and approval, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) to identify general and specific measures to minimize potential impacts to significant paleontological resources. Approval of the PRMMP by the CPM shall occur prior to any ground disturbance. The PRMMP shall function as the formal guide for monitoring, collecting and sampling activities and may be modified with CPM approval. This document shall be used as a basis for discussion in the event that on-site decisions or changes are proposed. Copies of the PRMMP shall reside with the PRS, each monitor, the project owner's on-site manager, and the CPM.

The PRMMP shall be developed in accordance with the guidelines of the Society of Vertebrate Paleontology (SVP, 1995) and shall include, but not be limited to, the following:

1. Assurance that the performance and sequence of project-related tasks, such as any literature searches, pre-construction surveys, worker environmental training, fieldwork, flagging or staking, construction monitoring, mapping and data recovery, fossil preparation and collection, identification and inventory, preparation of final reports, and transmittal of materials for curation will be performed according to the PRMMP procedures;
2. Identification of the person(s) expected to assist with each of the tasks identified within the PRMMP and the Conditions of Certification;
3. A thorough discussion of the anticipated geologic units expected to be encountered, the location and depth of the units relative to the project when known, and the known sensitivity of those units based on the occurrence of fossils either in that unit or in correlative units;
4. An explanation of why, how, and how much sampling is expected to take place and in what units. Include descriptions of different sampling procedures that shall be used for fine-grained and coarse-grained units;
5. A discussion of the locations of where the monitoring of project construction activities is deemed necessary, and a proposed plan for the monitoring and sampling;
6. A discussion of the procedures to be followed in the event of a significant fossil discovery, halting construction, resuming construction, and how notifications will be performed;
7. A discussion of equipment and supplies necessary for collection of fossil materials and any specialized equipment needed to prepare, remove, load, transport, and analyze large-sized fossils or extensive fossil deposits;
8. Procedures for inventory, preparation, and delivery for curation into a retrievable storage collection in a public repository or museum, which meets the Society of Vertebrate Paleontology standards and requirements for the curation of paleontological resources;
9. Identification of the institution that has agreed to receive any data and fossil materials collected, requirements or specifications for materials delivered for curation and how they will be met, and the name and phone number of the contact person at the institution; and
10. A copy of the paleontological Conditions of Certification.

Verification: At least 30 days prior to ground disturbance, the project owner shall provide a copy of the PRMMP to the CPM. The PRMMP shall include an affidavit of authorship by the PRS, and acceptance of the PRMMP by the project owner evidenced by a signature.

PAL-4 Prior to ground disturbance and for the duration of construction, the project owner and the PRS shall prepare and conduct weekly CPM-approved training for all recently employed project managers, construction supervisors and workers who are involved with or operate ground disturbing equipment or tools. Workers shall not excavate in sensitive units prior to receiving CPM-approved worker training. Worker training shall consist of an initial in-person PRS training during the project kick-off for those mentioned above. Following initial training, a CPM-approved video or in-person training may be used for new employees. The training program may be combined with other training programs prepared for cultural and biological resources, hazardous materials, or any other areas of interest or concern. No ground disturbance shall occur prior to CPM approval of the Worker Environmental Awareness Program (WEAP), unless specifically approved by the CPM.

The WEAP shall address the potential to encounter paleontological resources in the field, the sensitivity and importance of these resources, and the legal obligations to preserve and protect such resources.

The training shall include:

1. A discussion of applicable laws and penalties under the law;
2. Good quality photographs or physical examples of vertebrate fossils shall be provided for project sites containing units of high paleontologic sensitivity;
3. Information that the PRS or PRM has the authority to halt or redirect construction in the event of a discovery or unanticipated impact to a paleontological resource;
4. Instruction that employees are to halt or redirect work in the vicinity of a find and to contact their supervisor and the PRS or PRM;
5. An informational brochure that identifies reporting procedures in the event of a discovery;
6. A Certification of Completion of WEAP form signed by each worker indicating that they have received the training; and
7. A sticker that shall be placed on hard hats indicating that environmental training has been completed.

Verification: (1) At least 30 days prior to ground disturbance, the project owner shall submit the proposed WEAP including the brochure with the set of reporting procedures the workers are to follow.

(2) At least 30 days prior to ground disturbance, the project owner shall submit the script and final video to the CPM for approval if the project owner is planning on using a video for interim training.

(3) If the owner requests an alternate paleontological trainer, the resume and qualifications of the trainer shall be submitted to the CPM for review and approval prior to installation of an alternate trainer. Alternate trainers shall not conduct training prior to CPM authorization.

(4) In the Monthly Compliance Report (MCR) the project owner shall provide copies of the WEAP Certification of Completion forms with the names of those trained and the trainer or type of training (in-person or video) offered that month. The MCR shall also include a running total of all persons who have completed the training to date.

PAL-5 The project owner shall ensure that the PRS and PRM(s) monitor consistent with the PRMMP all construction-related grading, excavation, trenching, and augering in areas where potentially fossil-bearing materials have been identified, both at the site and along any constructed linear facilities associated with the project. In the event that the PRS determines full time monitoring is not necessary in locations that were identified as potentially fossil-bearing in the PRMMP, the project owner shall notify and seek the concurrence of the CPM.

The project owner shall ensure that the PRS and PRM(s) have the authority to halt or redirect construction if paleontological resources are encountered. The project owner shall ensure that there is no interference with monitoring activities unless directed by the PRS. Monitoring activities shall be conducted as follows:

1. Any change of monitoring different from the accepted schedule presented in the PRMMP shall be proposed in a letter or email from the PRS and the project owner to the CPM prior to the change in monitoring and included in the Monthly Compliance Report. The letter or email shall include the justification for the change in monitoring and be submitted to the CPM for review and approval.
2. The project owner shall ensure that the PRM(s) keeps a daily log of monitoring of paleontological resource activities. The PRS may informally discuss paleontological resource monitoring and mitigation activities with the CPM at any time.
3. The project owner shall ensure that the PRS immediately notifies the CPM within 24 hours of the occurrence of any incidents of non-compliance with any paleontological resources Conditions of Certification. The PRS shall recommend corrective action to resolve the issues or achieve compliance with the Conditions of Certification.
4. For any significant paleontological resources encountered, either the project owner or the PRS shall notify the CPM within 24 hours or Monday morning in the case of a weekend when construction has been halted due to a paleontological find.

The project owner shall ensure that the PRS prepares a summary of the monitoring and other paleontological activities that will be placed in the Monthly Compliance Reports (MCR). The summary will include the name(s) of PRS or PRM(s) active during the month, general descriptions of training and monitored construction activities and general locations of excavations, grading, etc. A section of the report shall include the geologic units or subunits encountered; descriptions of sampling within each unit; and a list of identified fossils. A final section of the report will address any issues or concerns about the project relating to paleontologic monitoring including any incidents of non-compliance and any changes to the monitoring plan that have been approved by the CPM. If no monitoring took place during the month, the report shall include an explanation in the summary as to why monitoring was not conducted.

Verification: The project owner shall ensure that the PRS submits the summary of monitoring and paleontological activities in the MCR. When feasible, the CPM shall be notified 10 days in advance of any proposed changes in monitoring different from the plan identified in the PRMMP. If there is any unforeseen change in monitoring, the notice shall be given as soon as possible prior to implementation of the change.

PAL-6 The project owner, through the designated PRS, shall ensure that all components of the PRMMP are adequately performed including collection of fossil materials, preparation of fossil materials for analysis, analysis of fossils identification and inventory of fossils, the preparation of fossils for curation, and the delivery for curation of all significant paleontological resource materials encountered and collected during the project construction.

Verification: The project owner shall maintain in their compliance file copies of signed contracts or agreements with the designated PRS and other qualified research specialists. The project owner shall maintain these files for a period of three years after completion and approval of the CPM-approved Paleontological Resource Report (See **PAL-7**). The project owner shall be responsible to pay any curation fees charged by the museum for fossils collected and curated as a result of paleontological mitigation. A copy of the letter of transmittal submitting the fossils to the curating institution shall be provided to the CPM.

PAL-7 The project owner shall ensure preparation of a Paleontological Resources Report (PRR) by the designated PRS. The PRR shall be prepared following completion of the ground disturbing activities. The PRR shall include an analysis of the collected fossil materials and related information and submitted to the CPM for review and approval.

The report shall include, but is not limited to, a description and inventory of recovered fossil materials; a map showing the location of paleontological resources encountered; determinations of sensitivity and significance; and a statement by the PRS that project impacts to paleontological resources have been mitigated below the level of significance.

Within 90 days after completion of ground disturbing activities, including landscaping, the project owner shall submit the Paleontological Resources Report under confidential cover to the CPM.

Certification of Completion
Worker Environmental Awareness Program
San Francisco Reliability Project (Docket #XX-AFC-XX)

This is to certify these individuals have completed a mandatory California Energy Commission-approved Worker Environmental Awareness Program (WEAP). The WEAP includes pertinent information on Cultural, Paleontology and Biological Resources for all personnel (i.e., construction supervisors, crews and plant operators) working on-site or at related facilities. By signing below, the participant indicates that they understand and shall abide by the guidelines set forth in the Program materials. Include this completed form in the Monthly Compliance Report.

No.	Employee Name	Title/Company	Signature
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Cultural Trainer: _____ Signature:_____Date: ___/___/__

Paleo Trainer: _____ Signature:_____Date: ___/___/__

Biological Trainer: _____ Signature:_____Date: ___/___/__

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POWER PLANT EFFICIENCY

Kevin Robinson and Steve Baker

SUMMARY OF CONCLUSIONS

The project, if constructed and operated as proposed, would generate a nominal 145 MW of peaking electric power, at an overall project fuel efficiency of 36 percent lower heating value at maximum full load. While it will consume substantial amounts of energy, it will do so in the most efficient manner practicable. It will not create significant adverse effects on energy supplies or resources, will not require additional sources of energy supply, and will not consume energy in a wasteful or inefficient manner. No energy standards apply to the project. Staff therefore concludes that the project would present no significant adverse impacts upon energy resources.

INTRODUCTION

The Energy Commission makes findings as to whether energy use by the San Francisco Electric Reliability Project (SFERP) will result in significant adverse impacts on the environment, as defined in the California Environmental Quality Act (CEQA). If the Energy Commission finds that the SFERP's consumption of energy would create a significant adverse impact, it must determine whether there are any feasible mitigation measures that could eliminate or minimize the impacts. In this analysis, staff addresses the issue of inefficient and unnecessary consumption of energy.

In order to support the Energy Commission's findings, this analysis will:

- examine whether the facility will likely present any adverse impacts upon energy resources;
- examine whether these adverse impacts are significant; and if so,
- examine whether feasible mitigation measures exist that would eliminate the adverse impacts, or reduce them to a level of insignificance.

LAWS, ORDINANCES, REGULATIONS AND STANDARDS

No Federal, State or local/county laws, ordinances, regulations and standards (LORS) apply to the efficiency of this project.

SETTING

The City and County of San Francisco (CCSF) proposes to construct and operate the 145 MW (nominal net output) simple cycle SFERP, providing peaking power to the Pacific Gas and Electric (PG&E) power grid system in San Francisco and the peninsula (SFPUC 2005a, AFC §§ 1.2, 1.9.4, 3.4.3, 10.3.2). (Note that this nominal rating is based upon preliminary design information and generating equipment manufacturers' guarantees. The project's actual maximum generating capacity may differ from this figure.) SFERP has executed a Power Purchase Agreement (PPA) with the California

Department of Water Resources (CDWR) that requires SFERP to sell the power from the four GE LM6000 SPRINT combustion turbine generators (CTG), received as part of a settlement with Williams Energy Marketing and Trading Company, to the CDWR (SFPUC 2005a, AFC § 1.1). This Staff Assessment will only evaluate the three-turbine project described in CCSF's Application for Certification (AFC) (the fourth turbine is proposed to be sited at the San Francisco International Airport). The applicant intends for SFERP to operate up to a total of 12,000 engine hours per year for the three combustion turbines. This is equivalent to each of the three turbines operating approximately 46 percent of the year (SFPUC 2005a, AFC § 2.4.1). Each CTG will utilize an electric water chiller at its inlet to maintain output and efficiency during periods of high ambient temperatures (SFPUC 2005a, AFC §§ 2.2.2, 2.2.3, 2.2.4). Natural gas will be transmitted to the plant via a new 900-foot section of 12-inch diameter (or less) pipeline connected to a booster compressor station that will be part of the SFERP facility (SFPUC 2005a, AFC §§ 1.2, 2.1, 6.1, 6.2).

ASSESSMENT OF IMPACTS

METHOD AND THRESHOLD FOR DETERMINING SIGNIFICANCE OF ENERGY RESOURCES

CEQA Guidelines state that the environmental analysis "...shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy" (Cal. Code Regs., tit. 14, § 15126.4(a)(1)). Appendix F of the Guidelines further suggests consideration of such factors as the project's energy requirements and energy use efficiency; its effects on local and regional energy supplies and energy resources; its requirements for additional energy supply capacity; its compliance with existing energy standards; and any alternatives that could reduce wasteful, inefficient and unnecessary consumption of energy (Cal. Code regs., tit. 14, § 15000 et seq., Appendix F).

The inefficient and unnecessary consumption of energy, in the form of non-renewable fuels such as natural gas and oil, constitutes an adverse environmental impact. An adverse impact can be considered significant if it results in:

- adverse effects on local and regional energy supplies and energy resources;
- a requirement for additional energy supply capacity;
- noncompliance with existing energy standards; or
- the wasteful, inefficient and unnecessary consumption of fuel or energy.

PROJECT ENERGY REQUIREMENTS AND ENERGY USE EFFICIENCY

Any power plant large enough to fall under Energy Commission siting jurisdiction will consume large amounts of energy. Under average ambient conditions, the SFERP would burn natural gas at a nominal rate of 31,667 million Btu per day lower heating value (LHV) (SFPUC 2005a, AFC § 2.2.6). This is a substantial rate of energy

consumption, and holds the potential to impact energy supplies. Under expected project conditions, electricity will be generated at a full load efficiency of approximately 36 percent LHV with the combustion turbines operating at full load (SFPUC 2005a, AFC § 10.4, Fig. 2-4a, Fig. 2-4b, Fig. 2-4c).

ADVERSE EFFECTS ON ENERGY SUPPLIES AND RESOURCES

The applicant has described its sources of supply of natural gas for the project (SFPUC 2005a, AFC §§ 1.2, 2.1, 2.2.6, 6.0, 10.2.1). Natural gas for the SFERP will be supplied from the existing PG&E natural gas transmission pipeline located adjacent to the project site. The PG&E natural gas system has access to gas from the Rocky Mountains, Canada and the Southwest. This represents a resource of considerable capacity. Furthermore, the PG&E gas supply represents an adequate source for a project of this size. It is therefore highly unlikely that the project could pose a significant adverse impact on natural gas supplies in California.

ADDITIONAL ENERGY SUPPLY REQUIREMENTS

Natural gas fuel will be supplied to the project by PG&E transmission pipeline 101 via a new 12-inch diameter pipeline constructed from the PG&E tap point to the SFERP site(SFPUC 2005a, AFC §§ 1.2, 2.1, 2.2.6, 6.0, 6.1, Appendix 6). A letter from PG&E dated August 13, 2004 confirms the ability and willingness of PG&E to provide the necessary quantities of natural gas to the SFERP (PG&E 2004a). This is a resource with adequate delivery capacity for a project of this size. There is no real likelihood that the SFERP will require the development of additional energy supply capacity.

COMPLIANCE WITH ENERGY STANDARDS

No standards apply to the efficiency of the SFERP or other non-cogeneration projects.

ALTERNATIVES TO REDUCE WASTEFUL, INEFFICIENT AND UNNECESSARY ENERGY CONSUMPTION

The SFERP could be deemed to create significant adverse impacts on energy resources if alternatives existed that would reduce the project's use of fuel. Evaluation of alternatives to the project that could reduce wasteful, inefficient or unnecessary energy consumption first requires examination of the project's energy consumption. Project fuel efficiency, and therefore its rate of energy consumption, is determined by the configuration of the power producing system and by the selection of equipment used to generate power.

Project Configuration

The project objective is to reduce the need for existing unreliable and highly-polluting in-City generation while maintaining the reliability of the electric system (SFPUC 2005a, AFC §§ 1.1, 1.2.1, 3.0). It is the City's expectation that the SFERP will mostly operate to provide local reliability service. A simple-cycle configuration is consistent with and supports this expectation since the units will not be competitive with base load facilities (SFERP 2005n, Data Response 179). The SFERP will be configured as three simple cycle power plants in parallel, in which electricity is generated by three natural gas-fired turbine generators (SFPUC 2005a, AFC §§ 1.1, 1.2, 2.2.2, 2.2.4). This configuration,

with its short start-up time and fast ramping[1] capability, is well suited to providing peaking power. Further, when reduced output is required, one or two turbine generators can be shut down, allowing the remaining machine(s) to produce a percentage of the full power at optimum efficiency, rather than operating a single, larger machine at an inefficient part load output.

The applicant intends for this facility to operate in peaking duty up to a total of 12,000 engine hours per year for the three combustion turbines. This is equivalent to each of the three turbines operating approximately 46 percent of the year (SFPUC 2005a, AFC § 2.4.1).

Equipment Selection

Modern gas turbines embody the most fuel-efficient electric generating technology available today. The applicant will employ three General Electric LM6000 SPRINT gas turbine generators (SFPUC 2005a, AFC §§ 1.1, 1.2, 2.2.2, 2.2.4). The LM6000 SPRINT gas turbine to be employed in the SFERP represents one of the most modern and efficient such machines now available. The SPRINT version of this machine is nominally rated at 50 MW and 40.3 percent efficiency LHV at ISO[2] conditions (GTW 2004). This rating differs from SFERP's projected efficiency of 36 percent LHV because of the efficiency losses from parasitic loads (mechanical inlet air chillers) and the reduced system efficiency from the selective catalytic reduction units used on the exhaust of each unit.

Efficiency Of Alternatives To The Project

Alternative Generating Technologies

Alternative generating technologies for the SFERP are considered in the AFC (SFPUC 2005a, AFC § 9.7). Fossil fuels (oil and coal), biomass, geothermal, solar, hydroelectric, wind, and nuclear technologies are all considered. Biomass and fossil fuels other than natural gas cannot meet air quality limitations. Renewables require more physical area and are not always available when peaking power is needed. Given the project objectives, location, and air pollution control requirements, staff agrees with the applicant that only natural gas-burning technologies are feasible.

Natural Gas-Burning Technologies

Fuel consumption is one of the most important economic factors in selecting an electric generator; fuel typically accounts for over two-thirds of the total operating costs of a fossil-fired power plant (Power 1994). Under a competitive power market system, where operating costs are critical in determining the competitiveness and profitability of a power plant, the plant owner is thus strongly motivated to purchase fuel-efficient machinery.

Capital cost is also important in selecting generating machinery. Recent progress in the development of gas turbines, incorporating technological advances made in the

[1] Ramping is increasing and decreasing electrical output to meet fluctuating load requirements.

[2] International Standards Organization (ISO) standard conditions are 15°C (59°F), 60 percent relative humidity, and one atmosphere of pressure (equivalent to sea level).

development of aircraft (jet) engines, combined with the cost advantages of assembly-line manufacturing, has made available machines that not only offer the lowest available fuel costs, but at the same time sell for the lowest per-kilowatt capital cost.

The applicant will employ three General Electric LM6000PC SPRINT gas turbine generators (SFPUC 2005a, AFC §§ 1.1, 1.2, 2.2.2, 2.2.4). The LM6000PC SPRINT gas turbine to be employed in the SFERP represents one of the most modern and efficient such machines now available. The SPRINT version of this machine is nominally rated at 50 MW and 40.5 percent efficiency LHV at ISO[3] conditions (GTW 2004). (Staff compares alternative machines' ISO ratings as a common baseline, since project-specific ratings are not available for the alternative machines.) Alternative machines that can meet the project's objectives are the SGT-800 and FT8 TwinPac which, like the LM6000, are aeroderivative machines, adapted from Siemens Power Generation and Pratt & Whitney aircraft engines, respectively.

The Siemens SGT-800 gas turbine generator in a simple cycle configuration is nominally rated at 45 MW and 37 percent LHV at ISO conditions (GTW 2004).

Another alternative is the Pratt & Whitney FT8 TwinPac gas turbine generator in a simple cycle configuration that is nominally rated at 51 MW and 38.4 percent LHV at ISO conditions (GTW 2004).

Machine	Generating Capacity (MW)	ISO Efficiency (LHV)
GE LM6000PC SPRINT	**50**	**40.5 %**
SIEMENS	45	37.0 %
P & W FT8 TwinPac	51	38.4 %

Source: GTW 2004

The LM6000PC SPRINT is further enhanced by the incorporation of spray intercooling (thus the name, SPRay INTercooling). This takes advantage of the aeroderivative machine's two-stage compressor.[4] By spraying water into the airstream between the two compressor stages, the partially compressed air is cooled, reducing the amount of work that must be performed by the second stage compressor. This reduces the power consumed by the compressor, yielding greater net power output and higher fuel efficiency. The benefits in generating capacity and fuel efficiency increase with rising ambient air temperatures (GTW 2000).

While the LM6000 enjoys a slight advantage in fuel efficiency over the alternative machines, any differences among the three in actual operating efficiency will be relatively insignificant. Other factors such as generating capacity, cost, and ability to meet air pollution limitations are some of the factors considered in selecting the turbine model.

[3] International Standards Organization (ISO) standard conditions are 15°C (59°F), 60 percent relative humidity, and one atmosphere of pressure (equivalent to sea level).

[4] The larger industrial type gas turbines typically are single-shaft machines, with single-stage compressor and turbine. Aeroderivatives are two-shaft (or, in some cases, three-shaft) machines, with two-stage (or three-stage) compressors and turbines.

Inlet Air Cooling

A further choice of alternatives involves the selection of gas turbine inlet air-cooling methods.[5] The two commonly used techniques are the evaporative cooler or fogger, and the chiller (mechanical or absorption); both techniques increase power output by cooling the gas turbine inlet air. In general terms, a mechanical chiller can offer greater power output than the evaporative cooler on hot, humid days, but consumes electric power to operate its refrigeration process, thus slightly reducing overall net power output and, thus, overall efficiency. An absorption chiller uses less electric power, but necessitates the use of a substantial inventory of ammonia. An evaporative cooler or a fogger boosts power output best on dry days; it uses less electric power than a mechanical chiller, possibly yielding slightly higher operating efficiency. The difference in efficiency among these techniques is relatively insignificant.

The applicant proposes to employ inlet air mechanical chillers (SFPUC 2005a, AFC §§ 2.2.2, 2.2.4, 2.2.8). Given the relative lack of clear superiority of one system over the other, staff agrees that the applicant's approach will yield no significant adverse energy impacts.

In conclusion, the project configuration (simple cycle) and generating equipment chosen appear to represent the most efficient feasible combination to satisfy the project objectives. There are no alternatives that could significantly reduce energy consumption.

CUMULATIVE IMPACTS

Potrero Unit 3 and Hunters Point Unit 4 are nearby operating power plant projects that hold the potential for cumulative energy consumption impacts when aggregated with the project. A letter from PG&E dated August 13, 2004 confirms the ability and willingness of PG&E to provide the necessary quantities of natural gas to the SFERP with the Hunters Point and Potrero Unit 3 Power Plants on-line.

CCSF's proposed peaker plant (fourth turbine) at the San Francisco International airport will have a minimal impact on the natural gas supply of the San Francisco Bay Area. Staff knows of no other projects that could result in cumulative energy impacts.

Staff believes that construction and operation of the project will not bring about indirect impacts, in the form of additional fuel consumption, that would not have occurred but for the project. The older, less efficient power plants consume more natural gas to operate than the new, more efficient plants such as the SFERP (CEC 2004rr). The high efficiency of the proposed SFERP should allow it to compete very favorably, running at a high capacity factor, replacing less efficient power generating plants, and therefore not having an impact or even reducing the cumulative amount of natural gas consumed for power generation.

[5] A gas turbine's power output decreases as ambient air temperatures rise. The LM6000 SPRINT produces peak power at 50°F; this peak output can be maintained in much hotter weather by cooling the inlet air.

NOTEWORTHY PROJECT BENEFITS

The applicant claims that the SFERP complements City efforts to develop energy efficiency improvements, renewable resources, and clean distributed generation. The City meets their efforts to develop improvements in energy efficiency with the proposed use of the GE LM6000 SPRINT gas turbines for the SFERP. The GE LM6000 SPRINT gas turbines represent one of the most modern and efficient such machines now available. The SFERP will represent an efficient replacement for existing in-City generation.

The configuration of the SFERP, as three simple cycle power plants in parallel, allows for one or two turbine generators to be shut down, with the remaining machine(s) still producing a percentage of the full power at optimum efficiency, rather than operating a single, larger machine at an inefficient part load output.

CONCLUSIONS

The project, if constructed and operated as proposed, would generate a nominal 145 MW of peaking electric power, at an overall project fuel efficiency of 36 percent LHV at maximum full load. While it will consume substantial amounts of energy, it will do so in the most efficient manner practicable. It will not create significant adverse effects on energy supplies or resources, will not require additional sources of energy supply, and will not consume energy in a wasteful or inefficient manner. No energy standards apply to the project. Staff therefore concludes that the project would present no significant adverse impacts upon energy resources. No cumulative impacts on energy resources are likely.

PROPOSED CONDITIONS OF CERTIFICATION

No Conditions of Certification are proposed.

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POWER PLANT RELIABILITY

Kevin Robinson and Steve Baker

SUMMARY OF CONCLUSIONS

The City and County of San Francisco predicts an equivalent availability factor of 94 to 98 percent, which staff believes is achievable. Based on a review of the proposal, staff concludes that the plant will be built and operated in a manner consistent with industry norms for reliable operation. This should provide an adequate level of reliability. No conditions of certification are proposed.

INTRODUCTION

In this analysis, Energy Commission staff addresses the reliability issues of the project to determine if the power plant is likely to be built in accordance with typical industry norms for reliability of power generation. Staff uses this level of reliability as a benchmark because it ensures that the resulting project would likely not degrade the overall reliability of the electric system it serves (see **Setting** below).

The scope of this power plant reliability analysis covers:

- equipment availability;
- plant maintainability;
- fuel and water availability; and
- power plant reliability in relation to natural hazards.

Staff examined the project design criteria to determine if the project is likely to be built in accordance with typical industry norms for reliability of power generation. While the City and County of San Francisco (CCSF) has predicted an equivalent availability factor approaching 94 to 98 percent for the San Francisco Electric Reliability Project (SFERP) (see below), staff uses typical industry norms as a benchmark, rather than CCSF's projection, to evaluate the project's reliability.

LAWS, ORDINANCES, REGULATIONS AND STANDARDS

No Federal, State or local/county laws, ordinances, regulations and standards (LORS) apply to the reliability of this project.

SETTING

In the restructured competitive electric power industry, the responsibility for maintaining system reliability falls largely to the State's control area operators, such as the California Independent System Operator (Cal-ISO), that purchase, dispatch, and sell electric power throughout the State. How the Cal-ISO and other control area operators will ensure system reliability is still being determined; protocols are being developed and put in place that will, it is anticipated, allow sufficient reliability to be maintained under the

competitive market system. "Must-run" power purchase agreements and "participating generator" agreements are two mechanisms being employed to ensure an adequate supply of reliable power.

The Cal-ISO also requires those power plants selling ancillary services, as well as those holding reliability must-run contracts, to fulfill certain requirements, including:

- filing periodic reports on plant reliability;
- reporting all outages and their causes; and
- scheduling all planned maintenance outages with the Cal-ISO.

The Cal-ISO's mechanisms to ensure adequate power plant reliability apparently have been devised under the assumption that the individual power plants that compete to sell power into the system will each exhibit a level of reliability similar to that of power plants of past decades. However, there is cause to believe that, under free market competition, financial pressures on power plant owners to minimize capital outlays and maintenance expenditures may act to reduce the reliability of many power plants, both existing and newly constructed (McGraw-Hill 1994). It is possible that, if significant numbers of power plants exhibit individual reliability sufficiently lower than this historical level, the assumptions used by Cal-ISO to ensure system reliability will prove invalid, with potentially disappointing results. Until the restructured competitive electric power system has undergone a shakeout period, and the effects of varying power plant reliability are thoroughly understood and compensated for, staff will recommend that power plant owners continue to build and operate their projects to the level of reliability to which all in the industry are accustomed.

As part of its plan to provide needed reliability, the applicant proposes to operate the 145 MW (nominal output) SFERP, a simple-cycle peaking power plant, providing power to the San Francisco peninsula customers (SFPUC 2005a, AFC §§ 1.2, 1.9.4, 3.4.3, 10.3.2). The project estimates an Equivalent Availability Factor (EAF) in the range of 94 to 98 percent, and is designed to operate between approximately 15 and 100 percent of base load. The combustion turbine generator power block is also projected to operate between 15 and 100 percent of the time, if required, during each year of its operating life (SFPUC 2005a, AFC § 10.3.2).

ASSESSMENT OF IMPACTS

METHOD FOR DETERMINING RELIABILITY

The Commission must make findings as to the manner in which the project is to be designed, sited and operated to ensure safe and reliable operation [Cal. Code Regs., tit. 20, § 1752(c)]. Staff takes the approach that a project is acceptable if it does not degrade the reliability of the utility system to which it is connected. This is likely the case if the project exhibits reliability at least equal to that of other power plants on that system.

The availability factor for a power plant is the percentage of the time that it is available to generate power; both planned and unplanned outages subtract from its availability. Measures of power plant reliability are based on its actual ability to generate power when it is considered available and are based on starting failures and unplanned, or forced, outages. For practical purposes, reliability can be considered a combination of these two industry measures, making a reliable power plant one that is available when called upon to operate. Throughout its intended 30-year life (SFPUC 2005a, AFC § 10.3.2), the SFERP will be expected to perform reliably. Power plant systems must be able to operate for extended periods without shutting down for maintenance or repairs. Achieving this reliability is accomplished by ensuring adequate levels of equipment availability, plant maintainability with scheduled maintenance outages, fuel and water availability, and resistance to natural hazards. Staff examines these factors for the project and compares them to industry norms. If they compare favorably, staff can conclude that the SFERP will be as reliable as other power plants on the electric system, and will therefore not degrade system reliability.

EQUIPMENT AVAILABILITY

Equipment availability will be ensured by use of appropriate quality assurance/ quality control (QA/QC) programs during design, procurement, construction and operation of the plant, and by providing for adequate maintenance and repair of the equipment and systems (discussed below).

Quality Control Program

The applicant describes a QA/QC program (SFPUC 2005a, AFC §§ 2.4.5, 2.4.5.2) typical of the power industry. Equipment will be purchased from qualified suppliers, based on technical and commercial evaluations. Suppliers' personnel, production capability, past performance, QA programs and quality history will be evaluated. The project owner will perform receipt inspections, test components, and administer independent testing contracts. Staff expects implementation of this program to yield typical reliability of design and construction. To ensure such implementation, staff has proposed appropriate conditions of certification under the portion of this document entitled **Facility Design**.

PLANT MAINTAINABILITY

Equipment Redundancy

A generating facility called on to operate for long periods of time must be capable of being maintained while operating. A typical approach for achieving this is to provide redundant examples of those pieces of equipment most likely to require service or repair.

The applicant plans to provide appropriate redundancy of function for the project (SFPUC 2005a, AFC § 2.4.2). The fact that the project consists of three combustion turbine-generators configured as independent equipment trains provides inherent reliability. A single equipment failure cannot disable more than one train, thus allowing the plant to continue to generate (at reduced output). Further, all plant ancillary systems are also designed with adequate redundancy, and 100% backup of station service and

auxiliary transformers. The natural gas fuel supply line interconnects with Pacific Gas and Electric's (PG&E) natural gas transmission system at a natural gas pipeline header. This enables the project to be supplied by any one of three natural gas pipelines. In addition, four 33% capacity natural gas booster compressors are provided to insure an adequate fuel supply (SFERP 2004g).

With this opportunity for continued operation in the face of equipment failure, staff believes that equipment redundancy will be sufficient for a project such as this.

Maintenance Program

The applicant proposes to establish a preventive plant maintenance program typical of the industry (SFPUC 2005a, AFC § 2.4.5.2). Equipment manufacturers provide maintenance recommendations with their products; the applicant will base its maintenance program on these recommendations. The program will encompass preventive and predictive maintenance techniques. Maintenance outages will be planned for periods of low electricity demand. In light of these plans, staff expects that the project will be adequately maintained to ensure acceptable reliability.

FUEL AND WATER AVAILABILITY

For any power plant, the long-term availability of fuel and of water for cooling or process use is necessary to ensure reliability. The need for reliable sources of fuel and water is obvious; lacking long-term availability of either source, the service life of the plant may be curtailed, threatening the supply of power as well as the economic viability of the plant.

Fuel Availability

The SFERP will burn natural gas from the PG&E distribution system. Natural gas fuel will be supplied to the project by PG&E transmission pipeline 101 via a new 12-inch diameter pipeline constructed from the PG&E tap point to the SFERP site. PG&E transmission pipeline 101 is one of three supply lines to PG&E's San Francisco Load Center located adjacent to PG&E's Potrero Substation. The San Francisco Load Center is supplied by three natural gas lines (101, 109, and 132), which will provide the SFERP facility with a reliable source of natural gas (SFPUC 2005a, AFC §§ 1.2, 2.1, 6.0, 6.1, 10.3.1). This PG&E natural gas system represents a resource of considerable capacity and offers access to adequate supplies of gas. A letter from PG&E dated August 13, 2004 confirms the ability and willingness of PG&E to provide the necessary quantities of natural gas to the SFERP (PG&E 2004a). Staff agrees with the applicant's prediction that there will be adequate natural gas supply and pipeline capacity to meet the project's needs.

Water Supply Reliability

The SFERP will obtain untreated wastewater from the City of San Francisco's combined sewer system via a new 0.76-mile long pipeline. Recycled water will be produced (for gas turbine injection, inlet air chiller cooling and other plant uses) on site from this wastewater at a new water treatment system included as part of the project (SFPUC 2005a, AFC §§ 1.2, 2.2.7.2, 2.2.7.3, 2.4.4, 7.2.1, 8.14, 10.2.3). Potable water will be supplied by the City's potable water distribution system via an approximately 300 foot

pipeline (SFPUC 2005a, AFC §§ 7.3, 8.14, 10.2.3). Note that there is no substantial consumptive use of cooling water, as would be the case with a combined cycle power plant. Staff believes these sources yield sufficient likelihood of a reliable supply of water. (For further discussion of water supply, see the **Soil and Water Resources** section of this document.)

POWER PLANT RELIABILITY IN RELATION TO NATURAL HAZARDS

Natural forces can threaten the reliable operation of a power plant. High winds, tsunamis (tidal waves), seiches (waves in inland bodies of water), and flooding will not likely represent a hazard for this project, but seismic shaking (earthquake) may present a credible threat to reliable operation.

Seismic Shaking

The site lies within Seismic Zone 4 (SFPUC 2005a, AFC § 2.3.1); see that portion of this document entitled **Geology, Mineral Resources, and Paleontology**. The project will be designed and constructed to the latest appropriate LORS (SFPUC 2005a, AFC §§ 2.3.1, 10.2, Appendix 10). Compliance with current LORS applicable to seismic design represents an upgrading of performance during seismic shaking compared to older facilities, due to the fact that these LORS have been periodically and continually upgraded. By virtue of being built to the latest seismic design LORS, this project will likely perform at least as well as, and perhaps better than, existing plants in the electric power system. Staff has proposed conditions of certification to ensure this; see that portion of this document entitled **Facility Design**. In light of the historical performance of California power plants and the electrical system in seismic events, staff believes there is no special concern with power plant functional reliability affecting the electric system's reliability due to seismic events.

Tsunamis and Seiches

Although tsunamis and seiches can occur and cause tidal surges in the San Francisco Bay, the Bay greatly attenuates tsunamis that might reach the Golden Gate area and these events are extremely rare. Damaging tsunamis are not common on the California coast and devastating tsunamis have not occurred in historic times in the Bay area (SFPUC 2005a, AFC §§ 8.14.4.5, 8.14.6.5).

Flooding

Site average elevation is approximately 13.5 feet above mean sea level. The highest tide ever recorded in the project area is approximately 9.25 feet above the mean average sea level. A Storm Water Pollution Prevention Plan and Best Management Practices will be implemented during construction and operation to control erosion and sedimentation (SFPUC 2005a, AFC §§ 2.3.1, 8.14.4.5, 8.14.6.5, 8.14.8).

Staff believes there are no concerns with the power plant functional reliability due to tsunamis, seiches, and flooding events. For further discussion, see **Soil and Water Resources** and **Geology and Paleontology**.

COMPARISON WITH EXISTING FACILITIES

Industry statistics for availability factors (as well as many other related reliability data) are kept by the North American Electric Reliability Council (NERC). NERC continually polls utility companies throughout the North American continent on project reliability data through its Generating Availability Data System (GADS), and periodically summarizes and publishes the statistics on the Internet (http://www.nerc.com). NERC reports the following summary generating unit statistics for the years 1999 through 200 (NERC 2005):

For Gas Turbine units (All MW sizes)

Equivalent Availability Factor = 88.37 percent

The gas turbines that will be employed in the project have been on the market for several years now, and can be expected to exhibit typically high availability. The applicant's prediction of an equivalent availability factor of 94 to 98 percent (SFPUC 2005a, AFC § 10.3.2) appears reasonable compared to the NERC figure for similar plants throughout North America (see above). In fact, these new machines can well be expected to outperform the fleet of various (mostly older) gas turbines that make up the NERC statistics. Further, since the plant will consist of three parallel gas turbine generating trains, maintenance can be scheduled during those times of year when the full plant output is not required to meet market demand, typical of industry standard maintenance procedures. The applicant's estimate of plant availability, therefore, appears realistic. The stated procedures for assuring design, procurement and construction of a reliable power plant appear to be in keeping with industry norms, and staff believes they are likely to yield an adequately reliable plant.

NOTEWORTHY PROJECT BENEFITS

The applicant proposes that one of the primary justifications for the SFERP is that it will improve reliability in San Francisco and the peninsula. This will be accomplished by replacing old unreliable units with a new highly-reliable technology. The fact that the project consists of three combustion turbine generators configured as independent equipment trains provides inherent reliability. A single equipment failure cannot disable more than one train, thus allowing the plant to continue to generate (at reduced output)

The gas turbines that will be employed in the project have been on the market for several years now, and can be expected to exhibit typically high availability. The applicant's prediction of an equivalent availability factor of 94 to 98 percent appears reasonable compared to the NERC figure for similar plants throughout North America (see above). Staff believes this should provide an adequate level on reliability.

CONCLUSION

The City and County of San Francisco predicts an equivalent availability factor of 94 to 98 percent, which staff believes is achievable. Based on a review of the proposal, staff concludes that the plant would be built and operated in a manner consistent with

industry norms for reliable operation. This should provide an adequate level of reliability. No conditions of certification are proposed.

PROPOSED CONDITIONS OF CERTIFICATION

No conditions of certification are proposed.

REFERENCES

McGraw-Hill (McGraw-Hill Energy Information Services Group). 1994. Operational Experience in Competitive Electric Generation, an Executive Report, 1994.

NERC (North American Electric Reliability Council). 2005. 1999-2003 Generating Availability Report.

PG&E 2004a – Pacific Gas & Electric Company/Boschee (tn: 32098). Letter to confirm that PG&E does have capacity to serve the gas load with power plants on-line. Submitted to Hetch Hetchy Water & Power/Hollenbacher/CEC/Dockets on 8/13/04.

SFERP 2004g - CH2MHill/Carrier (tn:31268). Data Adequacy Supplement. Submitted to CEC/Pfanner/Dockets on 4/16/04.

SFPUC 2005a – San Francisco Public Utilities Commission/Hale (tn: 34403). Amendment A of the Application for Certification. Submitted to CEC/Therkelsen/Dockets on 3/25/05.

TRANSMISSION SYSTEM ENGINEERING

Mark Hesters

SUMMARY OF CONCLUSIONS

The addition of the San Francisco Energy Reliability Project would not cause any negative impacts on the Pacific Gas & Electric transmission system and interconnection would require no downstream facilities.

The San Francisco Energy Reliability Project switchyard and interconnection facilities will be adequate and reliable. The power plant switchyard, outlet lines, and termination are in accordance with good utility practices and will comply with all applicable laws, ordinances, regulations and standards, assuming the proposed conditions of certification are met.

Adding local generation would reduce transmission system losses and provide reactive power helping to maintain adequate voltage in the San Francisco Peninsula area.

INTRODUCTION

The Transmission System Engineering (TSE) analysis identifies whether or not the transmission facilities associated with the proposed San Francisco Energy Reliability Project conform to all applicable laws, ordinances, regulations and standards (LORS), required for safe and reliable electric power transmission, and assesses whether or not the applicant has accurately identified all interconnection facilities required as a result of the project.

Staff's analysis evaluates the power plant switchyard, outlet lines, termination and downstream facilities identified by the applicant and staff, and provides proposed conditions of certification to ensure the project complies with applicable LORS during the design review, construction, operation and potential closure of the project.

Additionally, under the California Environmental Quality Act (CEQA), the Energy Commission conducts an environmental review of the "whole of the action," which may include facilities not licensed by the Energy Commission (Cal. Code Reg., tit. 14, §15378). The Energy Commission identifies and evaluates the environmental effects of construction and operation of any new or modified transmission facilities required for the project's interconnection to the electric grid, even if such facilities are beyond the project's interconnection with the existing transmission system and not under the permit authority of the Energy Commission.

The California Independent System Operator (CA ISO) is responsible for ensuring electric system reliability for all participating transmission owning utilities and determines both the standards necessary to achieve reliability and whether a proposed project conforms with those standards. The CA ISO will provide testimony on these matters at the Energy Commission's hearings.

LAWS, ORDINANCES, REGULATION, AND STANDARDS

TSE Table 1 provides a brief list of the laws, ordinances, regulations and standards that apply to the proposed project. A detailed description of these LORS is provided in TSE Attachment 1.

TSE Table 1
Laws, Ordinances, Regulations, and Standards

Applicable Law	Description
Federal	
North American Electric Reliability Council (NERC Planning Standards	Principles designed to insure the adequacy and security of the transmission network.
National Electric Safety Code 1999 (NESC)	Provides electrical, mechanical, civil and structural requirements for overhead electric line construction and operation.
Regional	
Western Electricity Coordinating Council (WECC) Reliability Criteria	Insure continuity of load service and protection of the interconnected grid.
State	
California Public Utilities Commission (CPUC) General Orders 95 and 128	Rules for overhead and underground line construction
CA ISO Reliability Criteria	Incorporate NERC and WECC standards and some additional requirements.

SETTING

The City and County of San Francisco's San Francisco Electric Reliability Project (SFERP) would be located in San Francisco and deliver power to Pacific Gas and Electric's (PG&E) transmission network through an interconnection at the PG&E Potrero substation. Power would be produced by three simple-cycle gas turbines at 13.8 kilovolts (kV) (see Definition of Terms in Transmission System Engineering Attachment 2) and stepped up to 115 kV by three dedicated 13.8/115 kV grounded transformers. The SFERP power plant switchyard would consist of five circuit breakers organized in a three-phase ring bus configuration. Two three-phase 115 kV underground transmission circuits would connect the power plant switchyard to the Potrero substation (SFPUC 2005a, Page 5-2).

REGIONAL SETTING

The SFERP would be located in the City and County San Francisco which sits at the end of an essentially radial electric network in PG&E's transmission system. Currently there are two major power plants operating in San Francisco, the Hunters Point Power

Plant owned by PG&E and the Potrero Power plant owned by Mirant. It is anticipated that at least the larger of the two generating units at the Hunters Point Power Plant, Hunters Point 4, would be shut down if the SFERP begins operation. There are six transmission lines feeding San Francisco from the Peninsula (i.e. San Mateo County and parts of Santa Clara County), with one line, the Jefferson-Martin 230 kV Project, under construction.

PROJECT, SITE, AND VICINITY SETTING

The proposed power plant switchyard would consist of five circuit breakers in a 3-phase ring bus formation. Three of the circuit breakers would receive power from the generator transformers and the remaining two circuit breakers would connect to the Potrero substation. The latter interconnection would be through two approximately 3,000-foot three-phase 115 kV solid dielectric underground circuits and underground/overhead transmission structures located at the Potrero substation (SFPUC 2005a, Page 5-1). The applicant is seeking certification for two interconnection options; one would enter the Potrero Substation from Illinois street and the other from 22nd Street. Both interconnections to the Potrero Substation are acceptable. The power plant switchyard, outlet lines, and termination are in accordance with good utility practices and are acceptable.

ASSESSMENT OF IMPACTS AND DISCUSSION OF MITIGATION

METHOD AND THRESHEOLD FOR DETERMINING SIGNIFICANCE

For interconnecting a proposed generating unit to the grid, a System Impact Study (SIS) and a Facilities Study (FS) are generally performed to determine the alternate and preferred interconnection methods. The studies also determine the downstream transmission system impacts of the proposed project, and the mitigation measures needed to insure system conformance with performance levels required by utility reliability criteria, NERC planning standards, WECC reliability criteria, and CA ISO reliability criteria. The studies determine both positive and negative impacts of a proposed project and determine the alternate and preferred additional transmission facilities or other mitigation measures for any reliability criteria violations. The studies are conducted with and without the new generation project and its interconnection facilities. The studies normally include a Load Flow study, Transient Stability study, Post-transient Load Flow study, and Short Circuit study. The studies are focused on thermal overloads, voltage deviations, system stability (excessive oscillations in generators and transmission system, voltage collapse, loss of loads or cascading outages), and short circuit duties. The studies must be conducted under the normal condition (N-0) of the system and also for all credible contingency/emergency conditions, which includes the loss of a single system element (N-1) such as a transmission line, transformer, or a generator and the simultaneous loss of two system elements (N-2), such as two transmission lines or a transmission line and a generator. Equipment that is loaded beyond 100 percent of its thermal or path rating constitutes a violation of the reliability criteria. Generally voltage deviations must be within 95 percent and 105 percent of the facility rating. In addition to the above analysis, the studies may be performed to verify whether sufficient active or reactive power is available in the area system or area sub-system to which the new generator project would be interconnected.

New or modified downstream facilities that are a reasonably foreseeable consequence of approval of the project are analyzed from an engineering and environmental perspective but are not licensed by the Commission.

SCOPE OF STUDIES

PG&E completed several transmission studies for the SFERP. The first studies assumed the project originally proposed by the applicant and included four simple-cycle gas turbines (195 MW) at the Potrero site. Both PG&E and the CA ISO agreed that an additional study of the current proposal for three turbines at the current site was not necessary because the study of four turbines was already completed and showed that there were no adverse affects on the transmission system (SFERP 2004g, TSE attachment). Staff agrees with PG&E and the CA ISO.[1] Three studies, the System Impact Study, the Facilities Study, and the Updating Facilities Study, have been completed by PG&E and are briefly summarized below. These studies are still applicable to both of the proposed interconnections to the Potrero Substation, and the SFERP received Final Interconnection Approval from the CA ISO on June 27, 2005 (CA ISO 2005a, page 1).

System Impact Study:

Four turbines (195 MW) were studied with a proposed interconnection at the Potrero substation.

- 2005 PG&E Summer Peak base case with 1-in-10 year peak load conditions for the San Francisco/Peninsula area. Hunters Point Unit 4 was available in the without SFERP case and unavailable in the with SFERP case.
- 2005 PG&E Fall base case with loads approximately 96-percent of those used in the Summer Peak case and Potrero Unit 3 unavailable due to overhaul.

The study included Steady State Power Flow analysis, Dynamic Stability studies, and Short Circuit studies. Hunters Point Unit 4 was available in the without SFERP cases and was removed for the with SFERP cases. The Jefferson-Martin 230 kV transmission project was not included in either case (SFERP 2004a, Appendix 5).

Facilities Study:

The Facilities Study analyzed two 2005 Summer Peak cases with four turbines connected to the Potrero substation:

- Case one was exactly like the 2005 Summer Peak base case in the System Impact Study
- Case two studied four turbines with Mirant's Potrero Power Plant Unit 7 Project operating, Hunters Point Unit 4 unavailable, three Potrero-Hunters Point 115 kV cables operating and the Jefferson-Martin 230 kV transmission line operating.

[1] A smaller project will have impacts similar to or less than a larger project. Since the studies of the larger project (four turbines) indicated that there would be no adverse impacts the smaller project (three turbines) would have no adverse impacts as well.

Updating Facilities Study

The Updating Facilities Study analyzed the SFERP under the following conditions (SFERP 2004p, Page 6):

- 2007 Summer Peak Base Case with 1-in10 year summer heat wave load in the San Francisco/Peninsula area with three turbines (net output 145 MW) connected to the Potrero substation with Mirant's Potrero Power Plant Unit 7 operating, three 115 kV cables between the Potrero and Hunters Point substations operating and the Jefferson-Martin 230 kV transmission line operating.

STUDY RESULTS

Power Flow Study Results

The Power Flow Study results from the SIS, Facilities Study and Updating Facilities Study indicate that interconnection and operation of the SFERP will have no adverse electrical system impacts and will require no downstream mitigation measures. An emergency one-percent pre-project overload of the San Mateo-Belmont 115 kV line increased to a seven-percent overload with the addition of the SFERP (SFERP 2004a, Appendix 5, Page 12). However, this pre-existing overload is no longer an issue as PG&E remedied the overload through the addition of a 230/115 kV transformer at the Ravenswood Substation in May of 2004. No other overloads attributed to the SFERP were identified by the studies.

The PG&E power flow studies included an analysis of the transmission system impacts with Mirant's proposed Potrero Power Plant Unit 7 operating as well as the SFERP. Staff believes that it is unlikely that both projects will be completed because Mirant has been unable to obtain critical permits from the City and County of San Francisco for the Potrero Power Plant Unit 7 Project. Hence any theoretical downstream impacts that would result from the interconnection and operation of both the SFERP and Potrero Power Plant Unit 7 are considered highly unlikely and are thus, not analyzed in this assessment.

Compliance with LORS

The project will comply with the NERC/WSCC, Cal-ISO and NERC planning standards and reliability criteria. The proposed SFERP includes overhead and underground transmission lines, as well as substation and switchyard facilities. The applicant will design, build and operate the proposed facilities according the provisions of GO 95 and GO 128 or the NESC, Title 8, NEC, applicable interconnection and related industry standards.

DIRECT/INDIRECT IMPACTS AND MITIGATION

The results of the System Impact Study, the Facilities Study and the Updating Facilities Study did not identify any overloads and associated mitigation measures that would result from the interconnection and operation of the SFERP.

CUMULATIVE IMPACTS AND MITIGATION

There are currently no proposed projects other than the Potrero Power Plant Unit 7 that would cumulatively create transmission system impacts with SFERP. The System Impact Study for the SFERP analyzed the impacts of the four turbines available to the CCSF connected at Potrero and found that there were no impacts, a fourth turbine at another site in San Francisco would probably have similar impacts. The Updating Facilities Study included an analysis of the impacts of the SFERP in conjunction with the 615 MW Potrero Power Plant Unit 7 Project which provides some insight about the transmission facilities that would be needed if both the SFERP and another large generator were sited in San Francisco. The interconnection of both projects, according to the study, would likely require one major system upgrade, two approximately 6-mile 115 kV underground cables from the Martin Substation to the Potrero Substation.

NOTEWORTHY PUBLIC BENEFITS

Locating a power plant like the SFERP in the San Francisco load center would reduce system losses. Staff discusses system losses and other potential benefits of the SFERP in the Local System Effects analysis contained as part of the Preliminary Staff Assessment. Transmission line losses occur as a result of conductor resistance and corona discharge. Resistance line losses are significant, especially on long, heavily loaded lines such as those lines serving the San Francisco Peninsula. System losses must be made up for by producing additional generation. As well as reducing the cost of producing power in California, these loss savings would also contribute to a related decrease in the use of fossil fuels and water and in the reduction of air emissions, by diminishing the need for additional generation resources.

CONCLUSIONS

- Addition of the SFERP project does not cause any negative impacts on the PG&E transmission system and interconnection would require no downstream facilities.
- The SFERP does not cause any normal or contingency condition overloads to the transmission grid.
- The SFERP does not cause voltage criteria or system stability criteria violations.
- The SFERP project switchyard and interconnection facilities will be adequate and reliable. The power plant switchyard, outlet lines, and termination are in accordance with good utility practices and are acceptable. Staff concludes that these facilities will comply with all applicable LORS, assuming the conditions of certification are met.
- Adding local generation such as the SFERP would reduce transmission system losses, a noteworthy public benefit.
- The existing circuit breakers are capable of handling the increase in fault level with the addition of the SFERP.

PROPOSED CONDITIONS OF CERTIFICATION

TSE-1 The project owner shall furnish to the CPM and to the CBO a schedule of transmission facility design submittals, a Master Drawing List, a Master Specifications List, and a Major Equipment and Structure List. The schedule shall contain a description and list of proposed submittal packages for design, calculations, and specifications for major structures and equipment. To facilitate audits by Energy Commission staff, the project owner shall provide designated packages to the CPM when requested.

Verification: At least 60 days (or a lesser number of days mutually agreed to by the project owner and the CBO) prior to the start of construction, the project owner shall submit the schedule, a Master Drawing List, and a Master Specifications List to the CBO and to the CPM. The schedule shall contain a description and list of proposed submittal packages for design, calculations, and specifications for major structures and equipment (see a list of major equipment in **Table 1: Major Equipment List** below). Additions and deletions shall be made to the table only with CPM and CBO approval. The project owner shall provide schedule updates in the Monthly Compliance Report.

Table 1: Major Equipment List
Breakers
Step-up Transformer
Switchyard
Busses
Surge Arrestors
Disconnects
Take off facilities
Electrical Control Building
Switchyard Control Building
Transmission Pole/Tower
Grounding System

TSE-2 Prior to the start of construction the project owner shall assign an electrical engineer and at least one of each of the following to the project: A) a civil engineer; B) a geotechnical engineer or a civil engineer experienced and knowledgeable in the practice of soils engineering; C) a design engineer, who is either a structural engineer or a civil engineer fully competent and proficient in the design of power plant structures and equipment supports; or D) a mechanical engineer. (Business and Professions Code Sections 6704 et seq., require state registration to practice as a civil engineer or structural engineer in California.)

The tasks performed by the civil, mechanical, electrical or design engineers may be divided between two or more engineers, as long as each engineer is responsible for a particular segment of the project (e.g., proposed earthwork, civil structures, power plant structures, equipment support). No segment of the

project shall have more than one responsible engineer. The transmission line may be the responsibility of a separate California registered electrical engineer. The civil, geotechnical or civil and design engineer assigned in conformance with Facility Design condition **GEN-5**, may be responsible for design and review of the TSE facilities.

The project owner shall submit to the CBO for review and approval, the names, qualifications and registration numbers of all engineers assigned to the project. If any one of the designated engineers is subsequently reassigned or replaced, the project owner shall submit the name, qualifications and registration number of the newly assigned engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer. This engineer shall be authorized to halt earthwork and to require changes; if site conditions are unsafe or do not conform with predicted conditions used as a basis for design of earthwork or foundations.

The electrical engineer shall:

1. Be responsible for the electrical design of the power plant switchyard, outlet and termination facilities; and
2. Sign and stamp electrical design drawings, plans, specifications, and calculations.

Verification: At least 30 days (or a lesser number of days mutually agreed to by the project owner and the CBO) prior to the start of rough grading, the project owner shall submit to the CBO for review and approval, the names, qualifications and registration numbers of all the responsible engineers assigned to the project. The project owner shall notify the CPM of the CBO's approvals of the engineers within five days of the approval.

If the designated responsible engineer is subsequently reassigned or replaced, the project owner has five days in which to submit the name, qualifications, and registration number of the newly assigned engineer to the CBO for review and approval. The project owner shall notify the CPM of the CBO's approval of the new engineer within five days of the approval.

TSE-3 If any discrepancy in design and/or construction is discovered in any engineering work that has undergone CBO design review and approval, the project owner shall document the discrepancy and recommend corrective action. (1998 CBC, Chapter 1, Section 108.4, Approval Required; Chapter 17, Section 1701.3, Duties and Responsibilities of the Special Inspector; Appendix Chapter 33, Section 3317.7, Notification of Noncompliance]. The discrepancy documentation shall become a controlled document and shall be submitted to the CBO for review and approval and shall reference this condition of certification.

Verification: The project owner shall submit a copy of the CBO's approval of any corrective action taken to resolve a discrepancy to the CPM within 15 days of receipt. If corrective action is not approved, the project owner shall advise the CPM, within five

days, of the reason for disapproval, and the revised corrective action required to obtain the CBO's approval.

TSE-4 For the power plant switchyard, outlet line and termination, the project owner shall not begin any increment of construction until plans for that increment have been approved by the CBO. These plans, together with design changes and design change notices, shall remain on the site for one year after completion of construction. The project owner shall request that the CBO inspect the installation to ensure compliance with the requirements of applicable LORS. The following activities shall be reported in the Monthly Compliance Report:

a) receipt or delay of major electrical equipment;

b) testing or energization of major electrical equipment; and

c) the number of electrical drawings approved, submitted for approval, and still to be submitted.

Verification: At least 30 days (or a lesser number of days mutually agreed to by the project owner and the CBO) prior to the start of each increment of construction, the project owner shall submit to the CBO for review and approval the final design plans, specifications and calculations for equipment and systems of the power plant switchyard, outlet line and termination, including a copy of the signed and stamped statement from the responsible electrical engineer attesting to compliance with the applicable LORS, and send the CPM a copy of the transmittal letter in the next Monthly Compliance Report.

TSE-5 The project owner shall ensure that the design, construction and operation of the proposed transmission facilities will conform to all applicable LORS, including the requirements listed below. The project owner shall submit the required number of copies of the design drawings and calculations as determined by the CBO.

a) The power plant switchyard and outlet line shall meet or exceed the electrical, mechanical, civil and structural requirements of CPUC General Order 95, CPUC General Order 128 or National Electric Safety Code (NESC), Title 8 of the California Code and Regulations (Title 8), Articles 35, 36 and 37 of the "High Voltage Electric Safety Orders", CA ISO standards, National Electric Code (NEC) and related industry standards.

1. The power plant switchyard shall consist of five circuit breakers in a 3-phase ring bus formation.
2. The outlet line shall consist of two approximately 3,000 foot solid dielectric underground circuits and an overhead/underground structure.
3. The outline shall enter the existing Potrero Substation from either Illinois Street or 22nd Street.

b) Breakers and busses in the power plant switchyard and other switchyards, where applicable, shall be sized to comply with a short-circuit analysis.

c) Outlet line crossings and line parallels with transmission and distribution facilities shall be coordinated with the transmission line owner and comply with the owner's standards.

d) The project conductors shall be sized to accommodate the full output from the project.

e) Termination facilities shall comply with applicable PG&E interconnection standards.

f) The project owner shall provide to the CPM:

1. The final Detailed Facility Study (DFS) including a description of facility upgrades, operational mitigation measures, and/or Special Protection System (SPS) sequencing and timing if applicable,

2. Executed project owner and CA ISO Facility Interconnection Agreement

Verification: At least 60 days prior to the start of construction of transmission facilities (or a lessor number of days mutually agree to by the project owner and CBO, the project owner shall submit to the CBO for approval:

a) Design drawings, specifications and calculations conforming with CPUC General Order 95, CPUC General Order 128 or NESC, Title 8, Articles 35, 36 and 37 of the "High Voltage Electric Safety Orders", NEC, applicable interconnection standards and related industry standards, for the poles/towers, foundations, anchor bolts, conductors, grounding systems and major switchyard equipment.

b) For each element of the transmission facilities identified above, the submittal package to the CBO shall contain the design criteria, a discussion of the calculation method(s), a sample calculation based on "worst case conditions"[2] and a statement signed and sealed by the registered engineer in responsible charge, or other acceptable alternative verification, that the transmission element(s) will conform with CPUC General Order 95, CPUC General Order 128 or NESC, Title 8, California Code of Regulations, Articles 35, 36 and 37 of the, "High Voltage Electric Safety Orders", NEC, applicable interconnection standards, and related industry standards.

c) Electrical one-line diagrams signed and sealed by the registered professional electrical engineer in responsible charge, a route map, and an engineering description of equipment and the configurations covered by requirements **TSE-5** a) through f) above.

d) The final DFS, including a description of facility upgrades, operational mitigation measures, and/or SPS sequencing and timing if applicable, shall be provided concurrently to the CPM.

TSE-6 The project owner shall inform the CPM and CBO of any impending changes, which may not conform to the requirements **TSE-5** a) through f), and have not received CPM and CBO approval, and request approval to implement such changes. A detailed description of the proposed change and complete engineering, environmental, and economic rationale for the change shall accompany the request. Construction involving changed equipment or substation configurations shall not begin without prior written approval of the changes by the CBO and the CPM. The CBO and CPM could approve changes in equipment or interconnection design that comply CPUC General Order 95,

[2] Worst case conditions for the foundations would include for instance, a dead-end or angle pole.

CPUC General Order 128 or NESC, Title 8, California Code of Regulations, Articles 35, 36 and 37 of the, "High Voltage Electric Safety Orders", NEC, applicable interconnection standards, and related industry standards and do not require a new System Impact Study or Facility Study.

Verification: At least 60 days prior to the construction of transmission facilities, the project owner shall inform the CBO and the CPM of any impending changes which may not conform to requirements of **TSE-5** and request approval to implement such changes.

TSE-**7** The project owner shall provide the following Notice to the California Independent System Operator prior to synchronizing the facility with the California Transmission system:

1. At least one week prior to synchronizing the facility with the grid for testing, provide the CA ISO a letter stating the proposed date of synchronization; and
2. At least one business day prior to synchronizing the facility with the grid for testing, provide telephone notification to the CA ISO Outage Coordination Department.

Verification: The project owner shall provide copies of the CA ISO letter to the CPM when it is sent to the CA ISO one week prior to initial synchronization with the grid. The project owner shall contact the CA ISO Outage Coordination Department, Monday through Friday, between the hours of 0700 and 1530 at (916) 351-2300 at least one business day prior to synchronizing the facility with the grid for testing. A report of conversation with the CA ISO shall be provided electronically to the CPM one day before synchronizing the facility with the California transmission system for the first time.

TSE-8 The project owner shall be responsible for the inspection of the transmission facilities during and after project construction, and any subsequent CPM and CBO approved changes thereto, to ensure conformance with CPUC General Order 95, CPUC General Order 128 or NESC, Title 8, CCR, Articles 35, 36 and 37 of the, "High Voltage Electric Safety Orders", applicable interconnection standards, NEC and related industry standards. In case of non-conformance, the project owner shall inform the CPM and CBO in writing, within 10 days of discovering such non-conformance and describe the corrective actions to be taken.

Verification: Within 60 days after first synchronization of the project, the project owner shall transmit to the CPM and CBO:

a) "As built" engineering description(s) and one-line drawings of the electrical portion of the facilities signed and sealed by the registered electrical engineer in responsible charge. A statement attesting to conformance with CPUC General Order 95, CPUC General Order 128 or NESC, Title 8, California Code of Regulations, Articles 35, 36 and 37 of the, "High Voltage Electric Safety Orders", and applicable interconnection standards, NEC, related industry standards, and these conditions shall be provided concurrently.

b) An "as built" engineering description of the mechanical, structural, and civil portion of the transmission facilities signed and sealed by the registered engineer in

responsible charge or acceptable alternative verification. "As built" drawings of the electrical, mechanical, structural, and civil portion of the transmission facilities shall be maintained at the power plant and made available, if requested, for CPM audit as set forth in the "Compliance Monitoring Plan".

c) A summary of inspections of the completed transmission facilities, and identification of any nonconforming work and corrective actions taken, signed and sealed by the registered engineer in charge.

REFERENCES

CA ISO2004a – California Independent System Operator. San Francisco Electric Reliability Project Final Interconnection Approval, May 28, 2004.

CA ISO2005a – California Independent System Operator. . San Francisco Electric Reliability Project Final Interconnection Approval, Submitted to CEC/Dockets on 6/27/05

SFERP2004a - City and County of San Francisco/Blout (tn: 31130). Application for Certification San Francisco Electric Reliability Project - 145-megawatt natural gas-fired peaking power plant located in San Francisco. Submitted to CEC/Therkelsen/Dockets on 3/18/04.

SFERP2004b - CH2MHill/Carrier (tn: 31126). Transmittal of Appendix 5, System Impact Study. Submitted to CEC/Pfanner/Dockets on 3/18/04.

SFERP2004g - CH2MHill/Carrier (tn: 31268). Data Adequacy Supplement. Submitted to CEC/Pfanner/Dockets on 4/16/04.

SFERP2004p – CH2MHill/Carrier (tn: 31858). Data Responses Set 1A. Attachment TSE-70A, Updating Facilities Study. Submitted to CEC/Pfanner/Dockets on 7/6/04.

SFPUC 2005a – San Francisco Public Utilities Commission/Hale (tn: 34403). Amendment A of the Application for Certification. Submitted to CEC/Therkelsen/Dockets on 3/25/05.

TSE ATTACHMENT 1 LORS

- North American Electric Reliability Council (NERC) Planning Standards provide policies, standards, principles and guides to assure the adequacy and security of the electric transmission system. With regard to power flow and stability simulations, these Planning Standards are similar to WECC's Criteria for Transmission System Contingency Performance. The NERC planning standards provide for acceptable system performance under normal and contingency conditions. The NERC planning standards apply not only to interconnected system operation but also to individual service areas (NERC 1998).
- Western Electric Coordinating Council (WECC) Reliability Criteria provide the performance standards used in assessing the reliability of the interconnected system. These Reliability Criteria require the continuity of service to loads as the first priority and preservation of interconnected operation as a secondary priority. The WECC Reliability Criteria include the Reliability Criteria for Transmission System Planning, Power Supply Design Criteria, and Minimum Operating Reliability Criteria. Analysis of the WECC system is based to a large degree on WECC Section 4 "Criteria for Transmission System Contingency Performance" which requires that the results of power flow and stability simulations verify established performance levels. Performance levels are defined by specifying the allowable variations in voltage, frequency and loading that may occur on systems other than the one in which a disturbance originated. Levels of performance range from no significant adverse effect outside a system area during a minor disturbance (loss of load or facility loading outside emergency limits) to a performance level that only seeks to prevent system cascading and the subsequent blackout of islanded areas. While controlled loss of generation, load, or system separation is permitted in extreme circumstances, their uncontrolled loss is not permitted (WECC 1998).
- California Public Utilities Commission (CPUC) General Order 95 (GO-95), "Rules for Overhead Electric Line Construction," formulates uniform requirements for construction of overhead lines. Compliance with this order ensures adequate service and safety to persons engaged in the construction, maintenance, operation, or use of overhead electric lines and to the public in general.
- California Public Utilities Commission (CPUC) General Order 128 (GO-128), "Rules for Underground Electric Line Construction," formulates uniform requirements for construction of overhead lines. Compliance with this order ensures adequate service and safety to persons engaged in the construction, maintenance, operation, or use of overhead electric lines and to the public in general.
- National Electric Safety Code 1999 provides electrical, mechanical, civil and structural requirements for overhead electric line construction and operation.
- CA ISO's Reliability Criteria also provide policies, standards, principles, and guides to assure the adequacy and security of the electric transmission system. With regard to power flow and stability simulations, these Planning Standards are similar to WECCs Criteria for Transmission System Contingency Performance and the NERC Planning Standards. The CA ISO Reliability Criteria incorporate the WECC Criteria

and NERC Planning Standards. However, the CA ISO Reliability Criteria also provide some additional requirements that are not found in the WECC Criteria or the NERC Planning Standards. The CA ISO Reliability Criteria apply to all existing and proposed facilities interconnecting to the CA ISO controlled grid. It also applies when there are any impacts to the CA ISO grid due to facilities interconnecting to adjacent controlled grids not operated by the CA ISO.

TSE ATTACHMENT 2 DEFINITION OF TERMS

AAC	All Aluminum conductor.
ADR	Alternative Dispute Resolution
Ancillary Services Market	The market for services other than scheduled energy that are required to maintain system reliability and meet WECC/NERC operating criteria. Such services include spinning, non-spinning, replacement reserves, regulation (AGC), voltage control and black start capability.
Ampacity	Current-carrying capacity, expressed in amperes, of a conductor at specified ambient conditions, at which damage to the conductor is nonexistent or deemed acceptable based on economic, safety, and reliability considerations.
Ampere	The unit of measure of electric current; specifically, a measure of the rate of flow of electrons past a given point in an electric conductor such as a power line.
Available Transmission Capacity (i.e., ATC)	Available Transmission Capacity in any hour is equal to Operational Transmission Capacity for that hour minus Existing Transmission Contracts for that same hour (ATC = OTC - ETC). (See the other definitions below).
Breaker	Circuit breaker - An automatic switch that stops the flow of electric current in a suddenly overloaded or otherwise abnormally stressed electric circuit.
Bundled Conductor	Two or more wires, connected in parallel through common switches, that act together to carry current in a single phase of an electric circuit.
Bus	Conductors that serve as a common connection for multiple transmission lines.

CA ISO	California Independent System Operator - The CA ISO is the FERC regulated control area operator of the CA ISO transmission grid. Its responsibilities include providing non-discriminatory access to the grid, managing congestion, maintaining the reliability and security of the grid, and providing billing and settlement services. The CA ISO has no affiliation with any market participant.
CA ISO Controlled Grid	The combined transmission assets of the Participating Transmission Owners (PTOs) that are collectively under the control of the CA ISO.
CA ISO Reliability Criteria	Reliability standards established by the NERC, WECC, and the ISO, as amended from time to time, including any requirements of the NRC.
CA ISO Planning Process	Annual studies conducted by the PTO's and CA ISO in an open stakeholder process. These studies determine the future transmission reinforcements necessary to enable the ISO Controlled Grid to meet the ISO Reliability Criteria. The CA ISO Planning Process also includes studies of new resource connections and third party proposals for new additions to the ISO Controlled Grid.
CA ISO Tariff	Document filed with the appropriate regulatory authority (FERC) specifying lawful rates, charges, rules, and conditions under which the utilities provide services to parties. A tariff typically includes rate schedules, list of contracts, rules, and sample forms.
Capacitor	An electric device used to store charge temporarily, generally consisting of two metallic plates separated by a dielectric.
Cogeneration	The consecutive generation of thermal and electric or mechanical energy.
Conductor	The part of the transmission line (the wire) which carries the current.

Congestion	The condition that exists when market participants seek to dispatch in a pattern which would result in power flows that cannot be physically accommodated by the system. Although the system will not normally be operated in an overloaded condition, it may be described as congested based on requested/desired schedules.
Congestion Management	Congestion management is a CA ISO scheduling protocol that is used to resolve Congestion.
Contingency	Disconnection or separation, planned or forced, of one or more components from the electric system.
Day-Ahead Market	The forward market for the supply of electrical power at least 24 hours before delivery to Buyers and End-Use Customers.
Demand	Load plus any exports from an electric system.
Demand Forecast	An estimate of demand (electric load) over a designated period of time.
Dispatch	The operating control of an integrated electric system to: (i) assign specific generators and other sources of supply to effect the supply to meet the relevant area Demand taken as Load rises of falls; (ii) control operations and maintenance of high voltage lines, substations, and equipment, including administration of safety procedures; (iii) operate interconnections (iv) manage energy transactions with other interconnected Control Areas; and (v) curtail Demand.
IV/dQ	The partial derivative of the voltage at a bus with respect to the reactive injection at that bus. (See any elementary college calculus text for further discussion of partial derivatives.) The point at which dV/dQ approaches infinity is defined as the point of voltage collapse.
Emergency Condition	The system condition when one or more system elements are forced (not scheduled) out of service.

Emergency Overload	Loading of a transmission system element above its Emergency Rating during an Emergency Condition.
Emergency Rating	A special rating established for short-term use in the event of a forced line or transformer outage (e.g., an emergency). An emergency rating may be expressed as a percentage of the normal rating (e.g., 115 percent of normal) or as an elevated current rating. For example, the normal rating for a conductor may be 1000 amperes and the emergency rating may be 1100 amperes.
Excessive Voltage Deviation	A sudden change in voltage at any substation as a result of a Contingency that exceeds established allowable levels of change.
Existing Transmission Contract (i.e., ETC)	A contract for transmission services that was in place prior to the start of ISO operations.
Fault Duty	The maximum amount of short-circuit current which must be interrupted by a given circuit breaker.
FERC	Federal Energy Regulatory Commission
General Order 95	California Public Utilities Commission (CPUC) General Order which specifies transmission line clearance requirements.
Generation Outlet Line	Transmission facilities (circuit, transformer, circuit breaker, etc.) linking generation to the main grid.
Generation Tie	Transmission facilities (circuit, transformer, circuit breaker, etc.) linking generation to the main grid.
Generator	A machine capable of converting mechanical energy into electrical energy.
Heat Rate	The amount of energy input to an electric generator required to obtain a given value of energy output. Usually expressed in terms of British Thermal Units per kilowatt hour (Btu/kWh).

Hour-Ahead Market	The electric power futures market that is established 1-hour before delivery to End-Use Customers.
Imbalance Energy	Energy not scheduled in advance that is required to meet energy imbalances in real-time. This energy is supplied by Participating Generators under the CA ISO's control, providing spinning and non-spinning reserves, replacement reserves, and regulation, and other generators able to respond to the CA ISO's request for more or less energy.
Interconnected System Reliability	See Reliability.
Kcmil or kcm	One thousand circular mils. A unit of the conductor's cross sectional area which, when divided by 1,273, gives the area in square inches.
Kv	Kilovolt - A unit of potential difference, or voltage, between two conductors of a circuit, or between a conductor and the ground.
Load	The rate expressed in kilowatts, or megawatts, at which electric energy is delivered to or by a system, or part of a system to end use customers at a given instant or averaged over an designated interval of time. (Also see Demand.)
Load Factor	The average Load over a given period (e.g., one year) divided by the peak Load in the period.
Loop	An electrical connection where a line is opened and a new substation is inserted into the opening. A looped configuration creates two lines, one from each of the original end points to the new substation. A looped configuration is more reliable than a tap configuration because the looped configuration provides two lines into the substation rather than just one in a tap configuration. Also, see Tap below.
Low Voltage	Voltage at any substation that is below the minimum acceptable level.

Marginal Unit	The Generator (or Load) that sets the market clearing price in the ISO's Ancillary Services Market (or the Power Exchange's energy market). The marginal unit is the Generator or Load that had the highest accepted bid for energy or Demand reduction.
MVAr	Megavar - One megavolt ampere reactive (a measure of reactive power). Reactive power demand is generally associated with motor loads and generation units or static reactive sources must supply this demand in the system.
MVA	Megavolt ampere - A unit of apparent power: equal to the product of the line voltage in kilovolts, the current in amperes, and the square root of 3 divided by 1000.
MW	Megawatt - A unit of power equivalent to 1,341 horsepower.
NERC	North American Electric Reliability Council
Nominal Voltage	Also known as Normal Voltage. The voltage at which power can be delivered to loads without damage to customer equipment or violation of CA ISO Reliability Criteria when the system is under Normal Operation.
Normal Operation	When all customers receive the power they are entitled to without interruption and at steady voltage, and no element of the transmission system is loaded beyond its continuous rating.
NRC	Nuclear Regulatory Commission
N-1 Contingency	A forced outage of one system element (e.g., a transmission line or generator).
N-2 Contingency	A forced outage of two system elements usually (but not exclusively) caused by one single event. Examples of an N-2 Contingency include loss of two transmission circuits on a single tower line or loss of two elements connected by a common circuit breaker due to the failure of that common breaker.

Operational Transfer Capability (i.e., OTC)	The maximum amount of power which can be reliably transmitted over an electrical path in conjunction with the simultaneous reliable operation of all other paths. This limit is typically defined by seasonal operating studies, and should not be confused with a path rating. Also referred to as OTC.
Outlet	Transmission facilities (circuit, transformer, circuit breaker, etc.) linking generation to the main grid.
Participating Generator	A generator that has signed an agreement with the CA ISO to abide by the rules and conditions specified in the CA ISO Tariff.
Participating Transmission Owner (i.e., PTO)	A Participating Transmission Owner is an electric transmission owning company that has turned over operational control of some or all of their electric transmission facilities to the CA ISO. Currently, the three Participating Transmission Owners are PG&E, SCE, and SDG&E.
Path Rating	The maximum amount of power which can be reliably transmitted over an electrical path under the best set of conditions. Path ratings are defined and specified in the WECC Path Rating Catalog.
PG&E	Pacific Gas & Electric Company
PG&E Interconnection Handbook	Detailed instructions to new customers (either load or generation) on how to interconnect to the PG&E electric system.
Post-Transient Voltage Deviation	The change in voltage from pre-contingency to post-contingency conditions once the system has had time to readjust.
Power Flow	A generic term used to describe the type, direction, and magnitude of actual or simulated electrical power flows on electrical systems.

Power Flow Analysis	A power flow analysis is a forward looking computer simulation of all major generation and transmission system facilities that identifies overloaded circuits, transformers and other equipment as well as system voltage levels under both Normal and Emergency Conditions.
Pump	A hydroelectric generator that acts as a motor and pumps water stored in a reservoir to a higher elevation.
Q/V Curve	A graphical representation of the voltage a given substation bus as a function of the reactive injection at that bus.
RAS	Remedial Action Scheme - An automatic control provision (e.g., trip a generation unit to mitigate a circuit overload).
Reactive Power	The portion of apparent power that does no work in an alternating current circuit but must be available to operate certain types of electrical equipment. Reactive Power is most commonly supplied by generators or by electrostatic equipment, such as shunt capacitors.
Reactive Margin	Reactive Power must be available at all load buses to prevent voltage collapse. Reactive margin is the amount of additional reactive load, usually measured in MVAR's, which may be added at a particular bus before the system experiences voltage collapse.
Reactor	An electric device used to store electric current temporarily, generally consisting of a coil of wire wound around a magnetic core.
Real Power	Real power is the work-producing component of apparent power and is required to operate any electrical equipment that performs energy conversion. Examples of this electrical equipment would be a heater, a lamp, or a motor. Real power is usually metered in units of kilowatt-hours (kWh).
Real-Time Market	The competitive generation market controlled and coordinated by the CA ISO for arranging real-time imbalance power.

Reconductor	The removal of old conductors on a transmission or distribution line followed by replacement of these conductors with new higher capacity conductors.
Reliability	The degree of performance of the elements of the bulk electric system that results in electricity being delivered to customers within accepted standards and in the amount desired. May be measured by the frequency, duration, and magnitude of adverse effects on the electric supply.
Reliability Criteria	Principals used to design, plan, operate, and assess the actual or projected reliability of an electric system.
Reliability Must-Run (i.e., RMR)	The minimum generation (number of units or MW output) required by the CA ISO to be on line to maintain system reliability in a local area.
SCE	Southern California Edison Company
SDG&E	San Diego Gas and Electric Company
Sensitivity Study	An analysis to determine the impact of varying one or more parameters on the results of the original analysis.
Series Capacitor	A static electrical device that is connected in-line with a transmission circuit that allows for higher power transfer capability by reducing the circuit's overall impedance.
Shunt Capacitor	A static electrical device that is connected between an electrical conductor and ground. A shunt capacitor normally will increase the voltage on a transmission circuit by providing reactive power to the electrical system.
Single Contingency	See N-1 Contingency.
Solid Dielectric Cable	Copper or aluminum conductors that are insulated by solid polyethylene type insulation and covered by a metallic shield and outer polyethylene jacket.

Source or Sink of Reactive Power	A source of Reactive Power is a device that injects reactive power into the power system (e.g., a Generator or a Capacitor). A sink of Reactive Power absorbs reactive power from the power system. Examples of reactive power sinks are shunt Reactors and motor loads.
Static Compensator	StatCom - a shunt connected power system device that includes Capacitors and Reactors controlled by solid state electronic devices as opposed to mechanically operated switches.
Substation	An assemblage of equipment that switches, changes, or regulates voltage in the electric transmission and distribution system.
Switchyard	A substation that is used as an outlet for one or more electric generators.
Switched Reactive Devices	A shunt Capacitor or shunt Reactor controlled by mechanically operated switches.
Switching Station	Similar to a substation, but there is only one voltage level.
Synchronous Condenser	A rotating mechanical device very similar to a Generator. The Synchronous Condenser has no mechanical power input and cannot produce Real Power. It can only produce or absorb Reactive Power.
System Reliability	See “Reliability”.
Tap	An electrical connection where a new line is connected to an intermediate point on an existing transmission line and a new substation is connected to the end of the new line. A tapped configuration creates a single transmission circuit with more than two end points (for example, a “T”). A tapped configuration is less reliable than a looped configuration because a fault on any portion of the tapped circuit causes a complete loss of power to the new substation. Also, see Loop above.

Tap Changing Transformer	A Transformer that has the ability change the number of windings in service. By changing the number of windings in service (by moving to a different tap), the Tap Changing Transformer has the ability to maintain a nearly constant voltage at its output terminals even though the input voltage to the Transformer may vary.
Thermal Loading Capability	The current-carrying capacity (in Amperes) of a conductor at specified ambient conditions, at which damage to the conductor is non-existent or deemed acceptable based on economic, safety, and reliability considerations.
Thermal overload	A thermal overload occurs when electrical equipment is operated in excess of its current carrying capability. Overloads are generally given in percent. For example, a transmission line may be said to be loaded to 105 percent of its rating.
Thermal rating	See Ampacity.
Transformer	A device that changes the voltage of alternating current electricity.
Transformer Loading Capability	The current-carrying capacity (in Amperes) of a transformer at specified ambient conditions, at which damage to the transformer is non-existent or deemed acceptable based on economic, safety, and reliability considerations.
TSE	Transmission System Engineering.
Underbuild	A transmission or distribution configuration where a transmission or distribution circuit is attached to a transmission tower or pole below (under) the principle transmission line conductors.
Undercrossing	A transmission configuration where a transmission line crosses below the conductors of another transmission line, generally at 90 degrees.

VAr	One Volt ampere reactive. Also see the definition for MVAr.
Voltage Collapse	The point at which the reactive demand at a substation bus exceeds the reactive supply at that bus. When the reactive demand is greater than the supply, the voltage at that point in the system will drop. Eventually, the voltage will drop to a point at which it is no longer possible to serve load at that bus.
Wheeling	A service provided by an entity, such as a utility, that owns transmission facilities whereby it receives electric energy into its system from one party and then uses its system to deliver that energy to a third party. The wheeling entity is usually paid a fee for this service.
WECC	Western Electricity Coordinating Council

LOCAL SYSTEM EFFECTS

Mark Hesters and Ajoy Guha

INTRODUCTION

This evaluation was prepared by California Energy Commission staff and provides an analysis of the local electric system effects of the San Francisco Electric Reliability Project and our conclusions regarding these effects. Local system effects are the localized electrical benefits and impacts that can be attributed to the addition of a new generator to the grid. The effects assessed in this evaluation include: the potential to defer capital investments, the effect on system losses and reactive power margin, and the ability of the San Francisco Electric Reliability Project to be integrated into the existing and planned system.

The evaluation of local system effects has been included to provide a greater understanding of the effect of the addition of the San Francisco Electric Reliability Project to the grid. Conformance with system reliability criteria is addressed in the Transmission System Engineering section of the Preliminary Staff Assessment.

Generally, there are two ways to supply power to the San Francisco peninsula. Power may be produced and distributed locally, or power may be produced remotely and shipped into the area through interconnected transmission facilities. The amount of power that can be delivered from remote locations is limited by the capacity of the transmission facilities serving the area. San Francisco Electric Reliability Project, if approved and built, would insert as much as 145 megawatts (MW) of real power and 70 megavars (MVar) of reactive power into the grid, which in turn would help maintain the ability of the Bay Area grid to transport power[5]. As a result, San Francisco Electric Reliability Project plays a key role (along with future transmission upgrades) in the long-term plan to retire older, less efficient Bay Area power plants. San Francisco Electric Reliability Project will also reduce system losses and provide reactive power, thus helping to maintain adequate voltage in the San Francisco peninsula area.

SUMMARY OF CONCLUSIONS

- The SFERP will reduce transmission system losses. Over 20 years, the savings to ratepayers have a present value at between $18 million and $27 million. In addition to reducing the cost of producing power in California, these loss savings would also contribute to a related decrease in the use of fossil fuels, water, and the production of air emissions by reducing the need for additional generation resources.

[5] In general, electrical energy defined by "real power" measured in megawatts is used to supply lighting, motors, computers and numerous other appliances. "Reactive power", measured in megavars, supplies voltage support to transport the energy through the electrical transmission system. Real power flow on transmission facilities must not exceed the capability of the transmission facilities. When real power flow is projected to exceed the capability of transmission facilities, either steps must be taken to limit the power flow, or additional or higher capacity equipment must be installed. If reactive power is insufficient, system voltages will decrease, which could lead to the controlled dropping of customer loads (rolling blackouts) and even the uncontrolled loss of load associated with voltage collapse.

2. A primary benefit of the addition of the San Francisco Electric Reliability Project (SFERP) is that the old and unreliable Potrero turbines (units 4, 5 and 6) could be released from their Reliability Must Run (RMR) contracts and retired.
3. The SFERP can be reliably connected to the CA ISO controlled grid with the projects identified in the current transmission plan and no "downstream" new or modified facilities are required to accommodate interconnection of the project.
4. The SFERP would increase reactive margin in San Francisco and thus improve system reliability and help to maintain sufficient voltage in the area.
5. There are no proposed conditions of certification for the LSE area.

LAWS, ORDINANCES, REGULATIONS AND STANDARDS (LORS)

Where appropriate, the authors have utilized North American Electric Reliability Council (NERC), Western Electric Coordinating Council (WECC), and CA ISO Grid Planning Standards regarding outages and system reactive margin criteria to assess the benefits or detriments of the SFERP project.

To assure that energy implications are considered in project decisions, California Environmental Quality Act (CEQA) guidelines require that environmental analyses include a discussion of the potential energy impacts of proposed projects with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy. The CEQA guidelines also require that the decision-maker consider "[t]he effects of the project on local and regional energy supplies and on requirements for additional capacity,..." (CEQA, Appendix F).

SETTING AND AREA RESOURCES

The San Francisco Peninsula area is composed of the City and County of San Francisco (CCSF), and the area between Pacific Gas & Electric's San Mateo substation and San Francisco. Major transmission lines feed the area through the San Mateo and Martin substations, which connect to the 230kV system (see Figure 1). The 2007 one-in-ten year peak load forecast for San Francisco is 957 MW. Power is supplied to the San Francisco Peninsula area by generation located in the area and across major transmission lines that bring in power from other areas.

GENERATION

The forecasted total local generation in the year 2007 is 383 MW (363 MW from the Potrero Power Plant and 20 MW from the United Cogeneration Plant)[6].

[6] The CA ISO, in its Memorandum regarding Action Plan for San Francisco, Options and Risks, describes the transmission projects that are required to release the Hunters Point Power Plant from its Reliability Must Run Contract. All of the transmission facilities required for the release from RMR contracts and the subsequent shutdown of the Hunters Point Power Plant Units 1 and 4 are expected to be complete before the SFERP would be operating.

LOCAL SYSTEM EFFECTS Table 1
San Francisco Peninsula Generation

Plant	Unit	Size (MW)	Fuel Type	In-service Date	Operating Restrictions
Potrero	3	207	Natural Gas	1965	Bay Area NOx restrictions
	4	52	Distillate	1976	877 hours/year
	5	52	Distillate	1976	877 hours/year
	6	52	Distillate	1976	877 hours/year
Hunters Point	1*	0 (52)	Distillate	1976	877 hours/year
	2*	0	None	1948	(107 MVAR)
	3*	0	None	1949	(107 MVAR)
	4*	0(163)	Natural Gas	1958	Bay Area NOx restrictions
United Cogen	1	20	Natural Gas	1986	none

*Hunters Point units 1-4 are expected to be shutdown.
Units 2 & 3 are used now as synchronous condensers.

The existing generation in San Francisco is highly vulnerable to disruption. The Potrero power plant is old and tends to have frequent outages. The largest and most critical generating unit on the peninsula is Potrero Unit 3 (a steam thermal generating unit), which began operating in 1965, and is significantly beyond the expected 30-year life of a power plant of its type.

Potrero Power Plant Units 4, 5, and 6 (52 MW each for a total of 156 MW) are combustion turbines that operate on distillate fuel with high air pollution emissions. These turbines are restricted in operation to 877 hours per year (or about ten-percent of a given calendar year) each according to their Bay Area Quality Management District permits.

TRANSMISSION

The San Francisco Peninsula receives its power from three sources. Part of the demand is served by power generated locally by San Francisco generation. Part of the San Francisco Peninsula load is served by power delivered to the San Mateo substation via 230 kV transmission lines connected to the Tesla, Newark and Ravenswood substations. Part of the San Francisco Peninsula load demand is also met through power delivered to the San Mateo substation via two 230 kV transmission lines crossing San Francisco Bay. And finally power will be delivered from the Metcalf substation up the Peninsula from a new Jefferson-Martin 230 kV line starting in 2006. Power will flow northward along the Peninsula from the San Mateo and Jefferson substations to the Martin Substation through the combination of two 230kV transmission lines, and six 115kV transmission lines (see Figure 1).

Figure 1
PROJECT DESCRIPTION
San Francisco Electric Reliability Project - Regional Setting

CALIFORNIA ENERGY COMMISSION, ENERGY FACILITIES SITING & ENVIRONMENTAL PROTECTION DIVISION, AUGUST 2004
SOURCE: California Energy Commission Statewide Transmission Line & Power Plant maps/2004 & USGS 7.5 Minute Quadrangles

Synchronous condensers located at the Hunters Point Power Plant are used to maintain voltages in the area[7] although according to the CA ISO Action Plan for San Francisco Memorandum these can be shut down in 2005. Numerous small shunt capacitors are also used within the local electric distribution system to maintain voltages by supplying reactive power support. Reactive power support cannot be transmitted over long distances and needs to be provided locally. While it is possible to operate a system devoid of local generation, in San Francisco's case this would require substantial new transmission lines to import the required quantity of power, and additional local voltage support devices (i.e., synchronous condensers, shunt capacitors, static Var. compensators etc.)

The operation of the existing power plants in San Francisco has long been contentious. The CCSF and PG&E have had an agreement that PG&E would shut down the Hunters Point Power Plant as soon as it could do so without compromising the reliability of the transmission network. The Maxwell Ordinance (see Attachment 1 for a brief summary) set strict requirements about the retrofit and shut down of existing generation in order for the CCSF to support Mirant's Potrero Power Plant Unit 7 Project. The CA ISO September 10, 2004, Memorandum from Marcie Edwards (CA ISO interim CEO) to the CA ISO Board of Governors clearly states the transmission and generation projects that need to be in place before the existing Hunters Point and Potrero Power Plants could be shutdown. All seven of the projects required for the shutdown of Hunters Point Power Plant are expected to be operating before the proposed on-line date of the SFERP.

LOCAL SYSTEM EFFECTS

The following types of local system effects have been reviewed to assess the potential benefits of local generation:

1. **The Effect on Plans for Transmission Facility Upgrades:** Deferral of capital facilities is determined by identifying proposed facilities for which need is delayed or eliminated because a target generator offsets the need for such facilities. In the case of San Francisco where there has been a public desire to see the existing Hunters Point and Potrero power plants shut down, a new plant or plants could allow for the shutdown of existing plants.
2. **The Effect on System Losses:** Comparing the system with and without SFERP interconnected and operating identifies the increase or decrease in losses.
3. **Impact on RMR Costs:** Would the proposed project increase or decrease RMR costs?
4. **Ability to be integrated into existing and planned system:** Would major system additions or system modifications be needed to accommodate the new facility?
5. **Affect on System Reliability:** Would the project increase or decrease system reliability?

[7] These are assumed to be shut down by the time the SFERP could be operational in 2007.

THE EFFECT ON PLANS FOR TRANSMISSION FACILITY UPGRADES

As stated earlier, power will be supplied to customers on the San Francisco Peninsula either through local generation or through transmission facilities that run in a northward loop along the Peninsula from the Jefferson and San Mateo Substation. Additional generation on the Peninsula can reduce the need for additional transmission facilities into the Peninsula but, given the potential retirement of existing generation in the Bay Area, staff is unable to attribute the deferral of any planned transmission facilities directly to the SFERP. The SFERP could be a component of a reliable network when the existing generators are allowed to retire.

Over the next five to ten years the addition of the SFERP will probably not defer any identified major transmission facilities. The CA ISO is currently developing a plan for the San Francisco Peninsula so the network will meet reliability criteria under a variety of load and resource scenarios from 2011 to 2016. Given the large number of scenarios that include the analysis of generation retirement and a potential Direct Current (DC) line from the East Bay to San Francisco it will be very hard to determine the impact of a single project like the SFERP on the need for transmission facilities. Transmission facilities that could be deferred by the SFERP could be offset by the retirement of other plants making the deferrals uncertain. The SFERP could allow for the retirement of existing generators.

Based on the CA ISO Action Plan for San Francisco Memorandum the SFERP and one additional new gas turbine are needed in order to allow the CA ISO to release Potrero units 4, 5 and 6 from their Reliability Must Run contracts which is required before the units could be shut down. There could be other options like the Babcock and Brown proposed DC (See staff's **Alternatives** analysis) line from the Pittsburgh Substation in Contra Costa County to the Potrero Substation, which if implemented, could allow the CA ISO to release the Potrero units 4, 5 and 6 from their RMR contracts. While release from the RMR contracts would allow the Potrero units to shut down, they are privately owned and would be free to operate in the energy market.

Thus, while the SFERP may not defer transmission facilities it is a key component in the release and eventual shutdown of Potrero Units 4, 5 and 6.

THE EFFECT ON SYSTEM LOSSES

Transmission system losses are a function of generation schedules, imports, exports, wheeling and system loop flow in addition to load. Transmission line losses occur as a result of conductor resistance and corona discharge. Resistance line losses are significant, especially on long, heavily loaded lines with a high load factor (75% - 100%). Typical values for utility systems in California range from 12 kW/mile to 500 kW/mile for line loadings between 25% and 100% of the conductor ratings. These losses are similar to the operation of electric strip heaters for home and building use where heat is produced by connecting a resistor heating element across 120V or 240V, and allowing the current to flow through the resistor element.

Based on the predicted 2007 Northern California system peak demand of 26,000 MW, the primary system losses (transmission lines and transformers) are approximately 916 MW without SFERP operating. Transmission losses thus constitute 3.5% of the load.

Transmission line losses were assessed for six dispatch scenarios. These dispatch scenarios were selected to bracket the range of dispatch conditions that occur in an actual year. Because the power supplied to the system must equal the system load plus the losses, when SFERP operates, 146 MW of generation as shown by the dispatch scenarios must be reduced to balance the additional 146 MW from SFERP. The baseline for comparison was the system losses without SFERP. Losses with SFERP on line and other units redispatched according to the established dispatch scenarios were then compared to the baseline.

The following dispatch scenarios were studied for the year 2007 to allow for the addition of the 146 MW SFERP:

1. Moss Landing Power Plant output reduced 146 MW.
2. Delta Energy Center output reduced 146 MW.
3. Metcalf Energy Center output reduced 146 MW.
4. Contra Costa Power Plant output reduced 146 MW.
5. Sutter Power Plant Project output reduced 146 MW.
6. Northwest Imports reduced 146 MW.

By adding SFERP and reducing generation as depicted in the dispatch scenarios, system peak loss reductions range between 6 MW and 21 MW for the different scenarios (See Appendix A, Table I). The additional 6 to 21 MW is "produced" without the use of any additional fuel or water and without producing any additional plant emissions.

To estimate the annual energy savings staff assigned probabilities to the various dispatch scenarios tested. Multiplying the unique dispatch related loss reduction value by the assigned dispatch probability provided an expected overall MW loss reduction value for the study year: 10.4 MW in 2007. The estimated annual energy savings that correspond to the expected overall system loss reduction values noted above are 27.5 GWh in year 2007. These amounts of energy savings are equivalent to the annual energy requirement for approximately 4,100 homes[8]. A reduction in system losses of this magnitude would save ratepayers $1.8 to $2.7 million per year. Over a twenty-year period, the present value of these savings to ratepayers is $18 to $27 million. In calculating these values for the loss savings, the following assumptions were made:

- Natural gas prices are $5 - $7/MMBtu,
- The displaced unit's heat rate is 13,000 – 14,000 Btu/kWh,
- Any emissions offsets created were valued at $0 (a very conservative assumption), and

[8] For this estimate staff assumed that an average household in California uses 6,600 KWh of energy annually.

- The rate of return is 8%.

The calculations for this analysis are contained in Appendix A, Table II, for the study year 2007.

To assure that energy implications are considered in project decisions, environmental documents must include a discussion of the potential energy impacts of proposed projects. This discussion places particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy and the project's effect on local and regional energy supplies. Most decision-makers generally are faced with only the negative energy use considerations when approving a project that may result in significant increased use of energy. This Commission faces a different situation in that SFERP will reduce energy losses while providing numerous other benefits. If one anticipates that SFERP, if built, would operate for at least 20 years, there are long-term environmental benefits related to reduced fuel and water use and to reduced emissions due to the reduction in electricity system losses.

RELIABILITY MUST RUN COSTS

According to the CA ISO's Action Plan for San Francisco, the SFERP plus one additional turbine at the San Francisco airport must be operating before Potrero units 4, 5 and 6 can be released from their RMR contracts Thus ratepayers would be saved the costs of the RMR contracts for Potrero units 4, 5 and 6. Currently, the RMR owners per their RMR contract are paid the difference between their variable operating costs and market prices, and some proportion of their fixed costs depending on the type of RMR contract selected by the unit owner. The savings due to ending the three Potrero RMR contracts is uncertain because the form of RMR contract that will be selected by a unit owner from time to time is uncertain.

ABILITY TO BE INTEGRATED INTO EXISTING AND PLANNED SYSTEM

Based on the various studies from PG&E (SFERP2004b and SFERP2004p), the SFERP can be connected to the CA ISO controlled grid with the projects identified in the current transmission plan and if several system protection schemes are implemented. There is no evidence that any existing facilities or the additional facilities planned to be added to the CA ISO controlled grid through 2007 will need to be modified because of the addition of SFERP.

AFFECT ON SYSTEM RELIABILITY

The SFERP would provide both real and reactive power to the grid in San Francisco. The reactive power, 70 MVAR, will increase the local reactive margin (see Appendix B, Tables I and II) and improve system reliability and voltage in the area.

CONCLUSIONS

1. The SFERP will reduce transmission system losses. Over 20 years, the savings to ratepayers have a present value at between $18 million and $27 million. As well as reducing the cost of producing power in California, these loss savings would also

contribute to a related decrease in the use of fossil fuels, water, and the production of air emissions by reducing the need for additional generation resources.

2. A primary benefit of the addition of the SFERP is that the old and unreliable Potrero turbines (units 4, 5 and 6) could be released from their RMR contracts and retired.
3. The effects of SFERP on RMR costs are uncertain.
4. The SFERP can be connected to the CA ISO controlled grid with the projects identified in the current transmission plan. No new or modified grid facilities are required to accommodate interconnection of the SFERP.

CONDITIONS OF CERTIFICATION

Staff has concluded that no conditions of certification are required for this area.

REFERENCES

The SFERP would increase reactive margin in San Francisco thus improving system reliability and voltage in the area.

CA ISO2004a - California Independent System Operator, Action Plan for San Francisco, Options and Risks, Memorandum from Marcie Edwards to the CA ISO Board of Governors, September 10, 2004.

CA ISO2003a - California Independent System Operator, San Francisco Peninsula Load Serving Capability, July 3, 2003.

CCSF 2001a - (City and County of San Francisco). CCSF Ord. Final CCSF Ordinance of May 29, 2001. Submitted to California Energy Commission, June 12, 2001.

SFERP2004a - City and County of San Francisco/Blout (tn:31130). Application for Certification San Francisco Electric Reliability Project - 145-megawatt natural gas-fired peaking power plant located in San Francisco. Submitted to CEC/Therkelsen/Dockets on 3/18/04.

SFERP2004b - CH2MHill/Carrier (tn:31126). Transmittal of Appendix 5, System Impact Study. Submitted to CEC/Pfanner/Dockets on 3/18/04.

SFERP2004g - CH2MHill/Carrier (tn:31268). Data Adequacy Supplement. Submitted to CEC/Pfanner/Dockets on 4/16/04.

SFERP2004p – CH2MHill/Carrier (tn:31858). Data Responses Set 1A. Attachment TSE-70A, Updating Facilities Study. Submitted to CEC/Pfanner/Dockets on 7/6/04.

DEFINITION OF TERMS

AAC	All Aluminum conductor.
ADR	Alternative Dispute Resolution
Ancillary Services Market	The market for services other than scheduled energy that are required to maintain system reliability and meet WSCC/NERC operating criteria. Such services include spinning, non-spinning, replacement reserves, regulation (AGC), voltage control and black start capability.
Ampacity	Current-carrying capacity, expressed in amperes, of a conductor at specified ambient conditions, at which damage to the conductor is nonexistent or deemed acceptable based on economic, safety, and reliability considerations.
Ampere	The unit of measure of electric current; specifically, a measure of the rate of flow of electrons past a given point in an electric conductor such as a power line.
Available Transmission Capacity (i.e., ATC)	Available Transmission Capacity in any hour is equal to Operational Transmission Capacity for that hour minus Existing Transmission Contracts for that same hour (ATC = OTC - ETC). (See the other definitions below).
Breaker	Circuit breaker - An automatic switch that stops the flow of electric current in a suddenly overloaded or otherwise abnormally stressed electric circuit.
Bundled Conductor	Two or more wires, connected in parallel through common switches, that act together to carry current in a single phase of an electric circuit.
Bus	Conductors that serve as a common connection for multiple transmission lines.
CA ISO	California Independent System Operator - The CA ISO is the FERC regulated control area operator of the CA ISO transmission grid. Its responsibilities include providing non-discriminatory access to the grid, managing congestion, maintaining the reliability and

	security of the grid, and providing billing and settlement services. The CA ISO has no affiliation with any market participant.
CA ISO Controlled Grid	The combined transmission assets of the Participating Transmission Owners (PTOs) that are collectively under the control of the CA ISO.
CA ISO Reliability Criteria	Reliability standards established by the NERC, WSCC, and the ISO, as amended from time to time, including any requirements of the NRC.
CA ISO Planning Process	Annual studies conducted by the PTO's and CA ISO in an open stakeholder process. These studies determine the future transmission reinforcements necessary to enable the ISO Controlled Grid to meet the ISO Reliability Criteria. The CA ISO Planning Process also includes studies of new resource connections and third party proposals for new additions to the CA ISO Controlled Grid.
CA ISO Tariff	Document filed with the appropriate regulatory authority (FERC) specifying lawful rates, charges, rules, and conditions under which the utilities provide services to parties. A tariff typically includes rate schedules, list of contracts, rules, and sample forms.
Capacitor	An electric device used to store charge temporarily, generally consisting of two metallic plates separated by a dielectric.
Cogeneration	The consecutive generation of thermal and electric or mechanical energy.
Conductor	The part of the transmission line (the wire) which carries the current.
Congestion	The condition that exists when market participants seek to dispatch in a pattern which would result in power flows that cannot be physically accommodated by the system. Although the system will not normally be operated in an overloaded condition, it may be described as congested based on requested/desired schedules.

Congestion Management	Congestion management is a CA ISO scheduling protocol that is used to resolve Congestion.
Contingency	Disconnection or separation, planned or forced, of one or more components from the electric system.
Day-Ahead Market	The forward market for the supply of electrical power at least 24 hours before delivery to Buyers and End-Use Customers.
Demand	Load plus any exports from an electric system.
Demand Forecast	An estimate of demand (electric load) over a designated period of time.
Dispatch	The operating control of an integrated electric system to: (i) assign specific generators and other sources of supply to effect the supply to meet the relevant area Demand taken as Load rises of falls; (ii) control operations and maintenance of high voltage lines, substations, and equipment, including administration of safety procedures; (iii) operate interconnections (iv) manage energy transactions with other interconnected Control Areas; and (v) curtail Demand.
dV/dQ	The partial derivative of the voltage at a bus with respect to the reactive injection at that bus. (See any elementary college calculus text for further discussion of partial derivatives.) The point at which dV/dQ approaches infinity is defined as the point of voltage collapse.
Emergency Condition	The system condition when one or more system elements are forced (not scheduled) out of service.
Emergency Overload	Loading of a transmission system element above its Emergency Rating during an Emergency Condition.

Emergency Rating	A special rating established for short term use in the event of a forced line or transformer outage (e.g., an emergency). An emergency rating may be expressed as a percentage of the normal rating (e.g., 115 percent of normal) or as an elevated current rating. For example, the normal rating for a conductor may be 1000 amperes and the emergency rating may be 1100 amperes.
Excessive Voltage Deviation	A sudden change in voltage at any substation as a result of a Contingency that exceeds established allowable levels of change.
Existing Transmission Contract (i.e., ETC)	A contract for transmission services that was in place prior to the start of ISO operations.
Fault Duty	The maximum amount of short-circuit current which must be interrupted by a given circuit breaker.
FERC	Federal Energy Regulatory Commission
General Order 95	California Public Utilities Commission (CPUC) General Order which specifies transmission line clearance and other requirements.
Generation Outlet Line	Transmission facilities (circuit, transformer, circuit breaker, etc.) linking generation to the main grid.
Generation Tie (gen tie)	Transmission facilities (circuit, transformer, circuit breaker, etc.) linking generation to the main grid.
Generator	A machine capable of converting mechanical energy into electrical energy.
Heat Rate	The amount of energy input to an electric generator required to obtain a given value of energy output. Usually expressed in terms of British Thermal Units per kilowatt hour (Btu/kWh).
Hour-Ahead Market	The electric power futures market that is established 1-hour before delivery to End-Use Customers.

Imbalance Energy	Energy not scheduled in advance that is required to meet energy imbalances in real-time. This energy is supplied by Participating Generators under the CA ISO's control, providing spinning and non-spinning reserves, replacement reserves, and regulation, and other generators able to respond to the CA ISO's request for more or less energy.
Interconnected System Reliability	See Reliability.
Kcmil or kcm	One thousand circular mils. A unit of the conductor's cross sectional area which, when divided by 1,273, gives the area in square inches.
Kv	Kilovolt - A unit of potential difference, or voltage, between two conductors of a circuit, or between a conductor and the ground.
Load	The rate expressed in kilowatts, or megawatts, at which electric energy is delivered to or by a system, or part of a system to end use customers at a given instant or averaged over a designated interval of time. (Also see Demand.)
Load Factor	The average Load over a given period (e.g., one year) divided by the peak Load in the period.
Loop	An electrical connection where a line is opened and a new substation is inserted into the opening. A looped configuration creates two lines, one from each of the original end points to the new substation. A looped configuration is more reliable than a tap configuration because the looped configuration provides two lines into the substation rather than just one in a tap configuration. Also, see Tap below.
Low Voltage	Voltage at any substation that is below the minimum acceptable level.
Marginal Unit	The Generator (or Load) that sets the market clearing price in the ISO's Ancillary Services Market. The marginal unit is the Generator or Load that had the highest accepted bid for energy or Demand reduction.

MVar	Megavar - One megavolt ampere reactive (a measure of reactive power). Reactive power demand is generally associated with motor loads and this demand must be supplied by generation units or static reactive sources in the system.
MVA	Megavolt ampere - A unit of apparent power: equal to the product of the line voltage in kilovolts, the current in amperes, and the square root of 3 divided by 1000.
MW	Megawatt - A unit of power equivalent to 1,341 horsepower.
NERC	North American Electric Reliability Council
Nominal Voltage	Also known as Normal Voltage. The voltage at which power can be delivered to loads without damage to customer equipment or violation of CA ISO Reliability Criteria when the system is under Normal Operation.
Normal Operation	When all customers receive the power they are entitled to without interruption and at steady voltage, and no element of the transmission system is loaded beyond its continuous rating.
NRC	Nuclear Regulatory Commission
N-1 Contingency	A forced outage of one system element (e.g., a transmission line or generator).
N-2 Contingency	A forced outage of two system elements usually (but not exclusively) caused by one single event. Examples of an N-2 Contingency include loss of two transmission circuits on a single tower line or loss of two elements connected by a common circuit breaker due to the failure of that common breaker.
Operational Transfer Capability (i.e., OTC)	The maximum amount of power which can be reliably transmitted over an electrical path in conjunction with the simultaneous reliable operation of all other paths. This limit is typically defined by seasonal operating studies, and should not be confused with a path rating. Also referred to as OTC.

Outlet	Transmission facilities (circuit, transformer, circuit breaker, etc.) linking generation to the main grid.
Participating Generator	A generator that has signed an agreement with the CA ISO to abide by the rules and conditions specified in the CA ISO Tariff.
Participating Transmission Owner (i.e., PTO)	A Participating Transmission Owner is an electric transmission owning company that has turned over operational control of some or all of their electric transmission facilities to the CA ISO. Currently, the three Participating Transmission Owners are PG&E, SCE, and SDG&E.
Path Rating	The maximum amount of power which can be reliably transmitted over an electrical path under the best set of conditions. Path ratings are defined and specified in the WSCC Path Rating Catalog.
PG&E	Pacific Gas & Electric Company
PG&E Interconnection Handbook	Detailed instructions to new customers (either load or generation) on how to interconnect to the PG&E electric system.
Post-Transient Voltage Deviation	The change in voltage from pre-contingency to post-contingency conditions once the system has had time to readjust.
Power Flow	A generic term used to describe the type, direction, and magnitude of actual or simulated electrical power flows on electrical systems.
Power Flow Analysis	A power flow analysis is a forward looking computer simulation of all major generation and transmission system facilities that identifies overloaded circuits, transformers and other equipment as well as system voltage levels under both Normal and Emergency Conditions.
Pump	A hydroelectric generator that acts as a motor and pumps water stored in a reservoir to a higher elevation.

Q/V Curve	A graphical representation of the voltage a given substation bus has as a function of the reactive injection at that bus.
RAS	Remedial Action Scheme - An automatic control provision (e.g., trip a generation unit to mitigate a circuit overload).SPS???
Reactive Power	The portion of apparent power that does no work in an alternating current circuit but must be available to operate certain types of electrical equipment. Reactive Power is most commonly supplied by generators or by electrostatic equipment, such as shunt capacitors.
Reactive Margin	Reactive Power must be available at all load buses to prevent voltage collapse. Reactive margin is the amount of additional reactive load, usually measured in MVAR's, which may be added at a particular bus before the system experiences voltage collapse.
Reactor	An electric device used to store electric current temporarily, generally consisting of a coil of wire wound around a magnetic core.
Real Power	Real power is the work-producing component of apparent power and is required to operate any electrical equipment that performs energy conversion. Examples of this electrical equipment would be a heater, a lamp, or a motor. Real power is usually metered in units of kilowatt-hours (kWh).
Real-Time Market	The competitive generation market controlled and coordinated by the CA ISO for arranging real-time imbalance power.
Reconductor	The removal of old conductors on a transmission or distribution line followed by replacement of these conductors with new higher capacity conductors.

Reliability	The degree of performance of the elements of the bulk electric system that results in electricity being delivered to customers within accepted standards and in the amount desired. May be measured by the frequency, duration, and magnitude of adverse effects on the electric supply.
Reliability Criteria	Principals used to design, plan, operate, and assess the actual or projected reliability of an electric system.
Reliability Must-Run (i.e., RMR)	The minimum generation (number of units or MW output) required by the CA ISO to be on line to maintain system reliability in a local area.
SCE	Southern California Edison Company
SDG&E	San Diego Gas and Electric Company
Sensitivity Study	An analysis to determine the impact of varying one or more parameters on the results of the original analysis.
Series Capacitor	A static electrical device that is connected in-line with a transmission circuit that allows for higher power transfer capability by reducing the circuit's overall impedance.
Shunt Capacitor	A static electrical device that is connected between an electrical conductor and ground. A shunt capacitor normally will increase the voltage on a transmission circuit by providing reactive power to the electrical system.
Single Contingency	See N-1 Contingency.
Solid Dielectric Cable	Copper or aluminum conductors that are insulated by solid polyethylene type insulation and covered by a metallic shield and outer polyethylene jacket.
Source or Sink of Reactive Power	A source of Reactive Power is a device that injects reactive power into the power system (e.g., a Generator or a Capacitor). A sink of Reactive Power absorbs reactive power from the power system. Examples of reactive power sinks are shunt Reactors and motor loads.

Static Compensator	StatCom - a shunt connected power system device that includes Capacitors and Reactors controlled by solid state electronic devices as opposed to mechanically operated switches.
Substation	An assemblage of equipment that switches, changes, or regulates voltage in the electric transmission and distribution system.
Switchyard	A substation that is used as an outlet for one or more electric generators.
Switched Reactive Devices	A shunt Capacitor or shunt Reactor controlled by mechanically operated switches.
Switching Station	Similar to a substation, but there is only one voltage level.
Synchronous Condenser	A rotating mechanical device very similar to a Generator. The Synchronous Condenser has no mechanical power input and cannot produce Real Power. It can only produce or absorb Reactive Power.
System Reliability	See "Reliability".
Tap	An electrical connection where a new line is connected to an intermediate point on an existing transmission line and a new substation is connected to the end of the new line. A tapped configuration creates a single transmission circuit with more than two end points (for example, a "T"). A tapped configuration is less reliable than a looped configuration because a fault on any portion of the tapped circuit causes a complete loss of power to the new substation. Also, see Loop above.
Tap Changing Transformer	A Transformer that has the ability to change the number of windings in service. By changing the number of windings in service (by moving to a different tap), the Tap Changing Transformer has the ability to maintain a nearly constant voltage at its output terminals even though the input voltage to the Transformer may vary.

Thermal Loading Capability	The current-carrying capacity (in Amperes) of a conductor at specified ambient conditions, at which damage to the conductor is non-existent or deemed acceptable based on economic, safety, and reliability considerations.
Thermal overload	A thermal overload occurs when electrical equipment is operated in excess of its current carrying capability. Overloads are generally given in percent. For example, a transmission line may be said to be loaded to 105 percent of its rating.
Thermal rating	See Ampacity.
Transformer	A device that changes the voltage of alternating current electricity.
Transformer Loading Capability	The current-carrying capacity (in Amperes) of a transformer at specified ambient conditions, at which damage to the transformer is non-existent or deemed acceptable based on economic, safety, and reliability considerations.
TSE	Transmission System Engineering.
Underbuild	A transmission or distribution configuration where a transmission or distribution circuit is attached to a transmission tower or pole below (under) the principle transmission line conductors.
Undercrossing	A transmission configuration where a transmission line crosses below the conductors of another transmission line, generally at 90 degrees.
Var	One Volt ampere reactive. Also see the definition for MVar.
Voltage	Electromotive force or potential difference.
Voltage Collapse	The point at which the reactive demand at a substation bus exceeds the reactive supply at that bus. When the reactive demand is greater than the supply, the voltage at that point in the system will drop. Eventually, the voltage will drop to a point at which it is no longer possible to serve load at that bus.

Wheeling	A service provided by an entity, such as a utility, that owns transmission facilities whereby it receives electric energy into its system from one party and then uses its system to deliver that energy to a third party. The wheeling entity is usually paid a fee for this service.
WSCC	Western Systems Coordinating Council

ATTACHMENT 1

MAXWELL ORDINANCE

An important consideration in determining the benefits of the Unit 7 project is the Maxwell ordinance which was approved by the San Francisco Board of Supervisors on May 29, 2001. This ordinance sets several requirements for City staff to consider supporting the permitting of Unit 7. Briefly these requirements are:

- Hunters Point Power Plant will cease operation as a fossil generation plant within 90 days of the operation of Unit 7.
- Potrero Power Plant Units 4 through 6 will be retrofitted or rebuilt with the best available pollution control technology (BACT) and will operate only during specified times.
- Potrero Power Plant Unit 3 will shut down as soon as it is no longer needed to sustain electric reliability in San Francisco. (CCSF Ord, Pages 2-4).

APPENDIX A

TABLE I

SFERPP LOSS ANALYSIS-YEAR 2007

TOTAL PG&E System Losses / System Loss Reduction

	PG&E SYSTEM LOSS PRE-PROJECT (MW)	PG&E SYSTEM LOSS WITH SFERPP 3 UNITS (MW)	SYSTEM PEAK LOSS REDUCTION (MW)	EXPECTED PEAK LOSS REDUCTION (MW)	ANNUAL ENERGY SAVED (GWh)	EXPECTED ANNUAL ENERGY SAVED (GWh)
B e Dispatch, PG&E Assesment 2 7 Summer peak, Swing= Morro B unit 4. Potrero 7 and SFERPP u s are off line.	916.49					
D atch 1, Local Adjustment : S RPP = +146 MW, Duke Moss= - 1 MW, Potrero 7 units off line.		907.13	9.36	1.68	27.62	4.97
D atch 2, Local Adjustment : S RPP = +146 MW, Delta Energy= -1 MW, Potrero 7 units off line.		905.29	11.20	2.02	33.05	5.95
D atch 3, Local Adjustment: S RPP = +146 MW, Metcalf = - 1 MW, Potrero 7 units off line.		908.59	7.90	1.42	23.31	4.20
D atch 4, Local Adjustment: S RPP = +146 MW, Contra C ta= -146 MW, Potrero 7 units off lir		905.34	11.15	2.01	32.90	5.92
D atch 5, Local Adjustment: S RPP = +146 MW, Sutter= -525 M, Potrero 7 units off line.		910.32	6.17	1.11	18.20	3.28
D atch 6, Remote Adjustment: S RPP = +146 MW, COI= -146 M, Potrero 7 units off line.		894.88	21.61	2.16	63.76	3.19
T als:				10.40		27.50
A rage:			11.23		33.14	–

NTE: Calculations for expected MW Peak loss & Energy savings and related present value in dollars a illustrated in Appendix A, Table II

APPENDIX A
TABLE II
SFERPP LOSS ANALYSIS-YEAR 2007
TOTAL PG&E System Losses / System Loss Reduction

	PG&E SYSTEM LOSS PRE-PROJECT (MW)	PG&E SYSTEM LOSS WITH SFERPP 3 UNITS (MW)	SYSTEM PEAK LOSS REDUCTION (MW)	PROBABILITY OF THE REDISPATCH SCENAIRIO	EQUIVALENT PEAK LOSS REDUCTION (MW)	SYSTEM ANNUAL LOAD FACTOR	EQUIVALENT HOURS LOSS FACTOR	ANNUAL ENERGY SAVED (GWh)	PROBABLE ANNUAL ENERGY SAVED (GWh)	ADJUSTMENT FACTOR FOR REMOTE DISPATCH	ADJUSTED PROBABLE ANNUAL ENERGY SAVED (GWh)
Base Dispatch, PG&E Assesment 2007 Summer peak, Swing= Morro Bay unit. Potrero 7 units and SFERPP 3 units are off line.	916.49										
Dispatch 1, Local Adjustment : SFERPP = +146 MW, Duke Moss= -146 MW, Potrero 7 units off line.		907.13	9.36	0.18	1.68	0.57	0.34	27.62	4.97	1.00	4.97
Dispatch 2, Local Adjustment : SFERPP = +146 MW, Delta Energy = -146 MW, Potrero 7 units off line		905.29	11.20	0.18	2.02	0.57	0.34	33.05	5.95	1.00	5.95
Dispatch 3, Local Adjustment: SFERPP = +146 MW, Metcalf = -146 MW, Pero 7 units off line.		908.59	7.90	0.18	1.42	0.57	0.34	23.31	4.20	1.00	4.20
Dispatch 4, Local Adjustment: SFERPP = +146 MW, Contra Costa= -146 MW, Potrero 7 units off line.		905.34	11.15	0.18	2.01	0.57	0.34	32.90	5.92	1.00	5.92
Dispatch 5, Local Adjustment: SFERPP = +146 MW, Sutter= -146 MW, Pero 7 units off line.		910.32	6.17	0.18	1.11	0.57	0.34	18.20	3.28	1.00	3.28
Dispatch 6, Remote Adjustment: SFERPP = +146 MW, COI= -146 MW, Pero 7 units off line.		894.88	21.61	0.10	2.16	0.57	0.34	63.76	6.38	0.50	3.19
Totals				1.00	10.40				30.69		27.50
Average			11.23					33.14			--

		Gas Cost ($/MMBtu)	Heat Rate (Btu/kWh)
Energy Savings (GWh)	27.50		
Cost of Energy ($/MWh)	$44.64	$3.72	12000
Total Savings per year in 1000 ($)	$1,227.64		
Total Savings per year in million ($)	$1.23		
Number of Years	20		
Interest Rate (%)	8%		
Present Value of Savings in 1000 ($)	$12,053.15		
Present Value of Savings in million ($)	$12.05		

		Gas Cost ($/MMBtu)	Heat Rate (Btu/kWh)
Energy Savings (GWh)	27.50		
Cost of Energy ($/MWh)	$76.70	$5.90	13000
Tot. Savings per year in 1000 ($)	$2,109.32		
Total Savings per year in million ($)	$2.11		
Number of Years	20		
Interest Rate (%)	8%		
Pr. Value of Savings in 1000 ($)	$20,709.61		
Pr. Value of Savings in million ($)	$20.71		

APPENDIX B
TABLE I
SFERP
TABLES FOR REACTIVE POWER MARGIN
(Without SVC At Potrero Plant)

N-1 Contingency Case: Jefferson - Martin C 230 kV Line

Load Flow Scenario	Monitored Bus	'Nose-Point' without SFERP Units (MVAr)	'Nose-Point' with SFERP Units (MVAr)	+/- Change in Bus Reactive Power Margin (MVAr)
Year 2007 Summer Peak	Potrero 115 kV	-901	-982	+81
	Mission 115 kV	-866	-943	+77
	Bayshore2 115 kV	-884	-963	+79
	Martin C 115 kV	-959	-1047	+88

N-2 Contingency Case: Martin C – San Mateo 230 kV Line + Potrero Gen. Unit 3

Load Flow Scenario	Monitored Bus	'Nose-Point' without SFERP Units (MVAr)	'Nose-Point' with SFERP units (MVAr)	+/- Change In Bus Reactive Power Margin (MVAr)
Year 2007 Summer Peak	Potrero 115 kV	-687	-779	+92
	Mission 115 kV	-657	-745	+88
	Bayshore2 115 kV	-675	-764	+89
	Martin C 115 kV	-742	-843	+101

N-2 Contingency Case: Martin C – San Mateo 230 kV Line and Jefferson – Martin C 230 kV Line

Load Flow Scenario	Monitored Bus	'Nose-Point' without SFERP Units (MVAr)	'Nose-Point' with SFERP Units (MVAr)	+/- Change in Bus Reactive Power Margin (MVAr)
Year 2007 Summer Peak	Potrero 115 kV	-678	-772	+94
	Mission 115 kV	-657	-745	+88
	Bayshore2 115 kV	-668	-760	+92
	Martin C 115 kV	-710	-811	+101

APPENDIX B
TABLE II
SFERP
TABLES FOR REACTIVE POWER MARGIN
(With SVC At Potrero Plant)

N-1 Contingency Case: Jefferson - Martin C 230 kV Line

Load Flow Scenario	Monitored Bus	'Nose-Point' without SFERP Units (MVAr)	'Nose-Point' with SFERP Units (MVAr)	+/- Change in Bus Reactive Power Margin (MVAr)
Year 2007 Summer Peak	Potrero 115 kV	-916	-975	+59
	Mission 115 kV	-880	-937	+57
	Bayshore2 115 kV	-898	-956	+58
	Martin C 115 kV	-974	-1040	+66

N-2 Contingency Case: Martin C – San Mateo 230 kV Line + Potrero Gen. Unit 3

Load Flow Scenario	MONITORED BUS	'Nose-Point' without SFERP Units (MVAr)	'Nose-Point' with SFERP units (MVAr)	+/- Change In Bus Reactive Power Margin (MVAr)
Year 2007 Summer Peak	Potrero 115 kV	-701	-772	+71
	Mission 115 kV	-672	-738	+66
	Bayshore2 115 kV	-689	-757	+68
	Martin C 115 kV	-757	-836	+79

N-2 Contingency Case: Martin C – San Mateo 230 kV Line and Jefferson – Martin C 230 kV Line

Load Flow Scenario	Monitored Bus	'Nose-Point' without SFERP Units (MVAr)	'Nose-Point' with SFERP Units (MVAr)	+/- Change in Bus Reactive Power Margin (MVAr)
Year 2007 Summer Peak	Potrero 115 kV	-692	-766	+74
	Mission 115 kV	-671	-739	+68
	Bayshore2 115 kV	-683	-754	+71
	Martin C 115 kV	-725	-805	+80

ALTERNATIVES

Susan V. Lee

SUMMARY OF FINDINGS

In the analysis of individual resource areas, the Preliminary Staff Assessment finds potential adverse impacts of the proposed San Francisco Electric Reliability Project air quality, cultural resources, hazardous materials management, land use, noise, and public health. Based on these and other concerns, this section evaluates six alternatives in detail. An additional 24 alternatives were considered but eliminated from detailed analysis. The alternatives analyzed in detail include three site alternatives (involving construction of the three turbines in a different location) at Brisbane, San Francisco International Airport, and East Bay alternative sites, two project alternatives (the Trans Bay Cable Project and the Potrero Power Plant Unit 7 Project), and the No Project Alternative.

Among the project alternatives analyzed, the alternative considering construction of Potrero Power Plant Unit 7 has the potential for greatest impacts. Of the alternative sites evaluated, the Brisbane Alternative has the potential for greatest impacts and would have greater impacts in comparison with the proposed San Francisco Electric Reliability Project in the issue areas of noise, land use, traffic, visual resources, and water and soils, as well as concerns relating to transmission system engineering and transmission safety and nuisance.

The Trans Bay Cable Project and the Brisbane, San Francisco International Airport, and East Bay Alternatives would fail to meet a major project objective: closing aging in-City generation, i.e., releasing Potrero Units 3 through 6 from applicable RMR contracts. Because these alternatives would not result in generation within the City and County of San Francisco, they would not meet California Independent System Operator requirements for generation to be "north of Martin Substation." The Trans Bay Cable Project would likely have the least environmental impacts overall (primarily because, as a transmission project, its operational impacts would be minor), but construction of this project would result in greater impacts than the proposed project to aquatic biological resources, water and soil, traffic, geological resources, and transmission line safety and nuisance impacts. However, without the ability to cause closure of in-City generation facilities, the overall impacts of the Trans Bay Cable Project would be greater than those of the San Francisco Electric Reliability Project.

Staff also believes that, overall, the No Project Alternative is not superior to the proposed project. This scenario would likely delay the closure of the Potrero Power Plant Units 3 through 6, which are objectives of the proposed San Francisco Electric Reliability Project and are older plants with have relatively higher air emissions. The No Project Alternative would also result in reduced reliability for San Francisco's electrical supply.

INTRODUCTION

The purpose of staff's alternatives analysis is to consider whether there are alternatives that could feasibly attain most of the basic objectives of the project and avoid or substantially lessen one or more of the significant effects of the project. If the Energy Commission determines that the proposed project will result in significant adverse impacts and identifies an alternative that meets these criteria, it cannot license the project unless it finds that the benefits of the project outweigh the impacts and that the alternative is infeasible. However, the Energy Commission does not have the authority to approve alternative configurations, require alternative technology designs, or to require the applicant to move the proposed project to another location without first conducting a more in-depth review of the environmental consequences of the alternative. If the applicant moves its proposed project to one of the alternative sites, Energy Commission staff will analyze any new proposed site to the same level of detail as the original proposed site. In addition, Energy Commission staff is required by agency regulations to examine the "feasibility of available site and facility alternatives to the applicant's proposal which substantially lessen the significant adverse impacts of the proposal on the environment" (Cal. Code Regs., tit. 20, §1765).

The Energy Commission is the permitting agency and "lead agency" for thermal power plants in California over 50 MW. It provides an environmental assessment of proposed projects pursuant to a regulatory program certified by the Secretary of Resources pursuant to the Califomia Environmental Quality Act (CEQA). The Commission's certified regulatory program is exempt from the requirement that it prepare an Environmental Impact Report (EIR). However, its environmental analysis must meet many basic CEQA requirements. When it prepares its analysis of project alternatives, staff follows the basic tenets of the CEQA Guidelines in the development of its analysis.

The CEQA Guidelines provide further direction by requiring an evaluation of the comparative merits of "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the project objectives" (Cal. Code Regs., tit. 14 §15126.6). The analysis should identify and compare the impacts of the various alternatives, but analysis of alternatives need not be in as much detail as the analysis of the proposed project.

In order to provide a comprehensive evaluation, staff's analysis considers a full range of alternatives. This section presents a summary of alternatives that were considered in two previous Energy Commission proceedings for San Francisco power plants: the 1994 proposal by the San Francisco Energy Corporation (SFEC; 94-AFC-1) and the 2000 Potrero Power Plant Unit 7 Project (00-AFC-4). The analysis also considers alternatives studied in the California Public Utilities Commission's (CPUC) Jefferson-Martin 230 kV Transmission Project Final Environmental Impact Report (CPUC 2003). In addition to information from these proceedings, this section evaluates other alternatives recommended by the public and those developed by staff.

Organization of This Section. The body of the analysis explains the analysis methodology used for alternatives and summarizes the conclusions of this section. Three appendices follow this Preliminary Staff Assessment (PSA) section:

- Appendix A presents environmental evaluation of the six selected alternatives (by environmental issue area).
- Appendix B presents the explanation of alternatives eliminated from detailed analysis.
- Appendix C presents supporting documentation (letters between the CCSF and the CA ISO and the San Francisco Action Plan).

APPROACH

This alternatives analysis uses the following approach, based on guidance in the CEQA Deskbook (1999):

1. Describe the project objectives.
2. Assess the proposed project's significant environmental effects.
3. Develop screening criteria for feasibility of alternatives.
4. Consider a broad range of alternatives, including the No Project Alternative, and select a reasonable range of alternatives that:
   - Meet some or all of the project objectives.
   - May be located on alternatives sites.
   - Substantially avoid or lessen one or more of the potential significant effects of the project; and
   - Are feasible based on specific economic, social, legal, or technical considerations.
5. Explain why other alternatives have been rejected from evaluation (Appendix B).
6. Provide meaningful evaluation and analysis of environmental impacts of the reasonable range of alternatives and the No Project Alternative in comparison with environmental effects of the proposed project (Appendix A).
7. Identify the environmentally superior alternative.

SUMMARY DESCRIPTION OF PROPOSED PROJECT

The proposed SFERP would consist of a nominal 145-megawatt (MW) simple-cycle plant, using three natural gas-fired General Electric LM 6000 gas turbines and associated infrastructure. Each CTG would generate a nominal 48 MW with the use of chillers. The project site is located near the San Francisco Bay in the Potrero District of San Francisco, on a four-acre site of City-owned land (see **ALTERNATIVES Figure 1** in

Appendix A). The project would include the construction of a new air-insulated 115-kilovolt (kV) switchyard on the north side of the site adjacent to 25th Street. A detailed description of the proposed SFERP is included in the Project Description section of this Staff Assessment.

BASIC OBJECTIVES OF THE PROJECT

The applicant has identified several basic objectives in the AFC, consistent with the findings and recommendations contained in its Electricity Resource Plan (ERP), for the development of the proposed power project. These objectives are:

1. Improve CCSF's electricity reliability;
2. Facilitate the shutdown of older, more polluting in-City generation; and
3. Minimize local impacts of electrical generation.

The CCSF, PG&E, and the California Independent System Operator (CA ISO) have extensively studied the electrical infrastructure in the CCSF. The applicant and CA ISO state in the San Francisco Action Plan[1] and related documents that SFERP is needed, as part of a portfolio of resources, to maintain system reliability and provide for closure of existing power plants (Edwards 2004a and 2004b). The applicant states that it is committed to maximizing energy efficiency improvements, developing renewable power, encouraging clean distributed generation and supporting needed transmission additions. Nonetheless, the siting of new, clean and operationally flexible generation is also considered necessary to provide for the near-term closure of the Hunters Point Power Plant and to address operational needs. The SFERP will also, in the longer term, facilitate the closure of units at the Potrero Power Plant.

POTENTIAL SIGNIFICANT ENVIRONMENTAL IMPACTS AND AREAS OF IDENTIFIED PUBLIC CONCERN

In this PSA, staff has identified that the SFERP has the potential to cause significant impacts to air quality, cultural resources, hazardous materials management, land use, noise, and public health. However, following the implementation of recommended mitigation, all impacts are expected to be reduced to less than significant levels. Staff's detailed assessments of the expected environmental consequences of the proposed project are discussed in the individual technical sections of the PSA. The following paragraphs summarize the areas of concern.

- **Air Quality**. The community has expressed concerns regarding the dispatch hours and the appropriate location for taking monitoring samples, about the cumulative air impacts of the project and air quality modeling predicts that the impacts for PM10 and PM2.5 would be greatest along the fence line of the facility. Since the public has access up to the property fence, additional mitigation beyond those proposed in the

[1] The San Francisco Action Plan was developed by the CA ISO working with the City of San Francisco and other stakeholders to establish the conditions upon which the existing generation at Hunters Point and Potrero would be released from RMR contracts. The San Francisco Action Plan involves the successful completion of a total of 12 transmission projects by PG&E, four peaking power plants by CCSF, and the Mirant retrofit of Potrero Unit 3 with emissions control technology for its temporary operation. The CA ISO does not control the dates of completion of these projects, nor does it control the permanent shutdown of the Hunters Point and Potrero generation.

AFC may be required to mitigate these impacts. However, Staff finds that, with the inclusion of the Conditions of Certification, the proposed project would be in compliance with all applicable laws, ordinances, regulations, and standards and would not result in any significant air quality-related impacts.

- **Cultural Resources.** Members of the Native American community have expressed concerns regarding development along the Bay. In addition, Staff initially identified the potential impact of vibrations from the construction of trenches on historic buildings within one block on either side of proposed trenches required for the underground transmission line, especially along 3rd Street between 20th and 23rd Streets. There is also a high potential for the presence of prehistoric archaeological resources on the western end of the process water pipeline route. However, overall Staff determined that there would be no impact on significant historic standing structures, historic districts, or ethnographic resources. Impacts to archaeological resources will be discussed at a later time, when the applicant provides two reports on the archaeological survey of portions of the impact area, projected for September 14, 2005 (Carrier 2005). When the reports are received and the cultural resources inventory is complete, the analysis of SFERP's potential impacts to archaeological resources will be completed and mitigation measures proposed for all impacts that are potentially significant.

- **Hazardous Materials Management**. The community is concerned about the impact of increased hazardous materials in their neighborhood; specifically, the impacts from the transportation of aqueous ammonia. Using treated wastewater for cooling the SFERP has been raised as a local public health concern to the immediate area and secondary impacts to the community near the Southeast Water Pollution Control Plant (SEWPCP). However, Staff's evaluation of the proposed project (with Staff's proposed mitigation measures) had determined that hazardous materials use would not present a significant impact to the public.

- **Land Use**. Conflicts may result between new housing proposed in community plans (i.e., Draft Central Waterfront Neighborhood Plan, South Bayshore Area Plan, and the Draft Bayview Hunters Point Redevelopment and Rezoning Project) and the expansion of long established industrial uses, such as power plants. Current and draft land use plans encourage new residential development as well as other industrial uses such as the cruise ship dry dock facility. However, Staff has found that the project will comply with all applicable land use laws, ordinances, regulations and standards and the proposed power plant will be compatible with existing and planned land uses.

- **Noise**. The project would increase noise levels in the project area. However, Staff finds that, with the inclusion of the Conditions of Certification, the proposed project would be in compliance with all applicable laws, ordinances, regulations, and standards and would not result in any significant noise-related impacts.

- **Public Health**. Public health impacts from air pollution generated by power plants are a major concern to the surrounding community. Concerns have been expressed by members of the community that the potential air quality impacts from the SFERP could exacerbate known health problems, including asthma rates in children. Specific mitigation measures have been requested by the community to address impacts to air quality with a program that is implemented locally. However, Staff does not

expect there would be any significant adverse cancer, or short - or long-term noncancer health effects from project toxic emissions if the proposed Conditions of Certification in this section and the Air Quality section are implemented.

IDENTIFICATION AND SCREENING OF ALTERNATIVES

Staff used a two-stage process to select alternatives for analysis. First a reasonable range of alternatives was identified, and then these alternatives were screened to select those that qualified for detailed evaluation. Staff considered alternatives to the project that were identified by several sources, including the applicant, members of the public, previous environmental documents, and other Energy Commission staff.

The following sections first describe alternatives suggested by the applicant, followed by alternative sites identified by the public and sites identified by staff. Appendix A presents analysis of six alternatives:

- Three site alternatives (involving construction of the three turbines in a different location): the Brisbane, San Francisco International Airport, and East Bay altemative sites.
- Two project alternatives: the Trans Bay Cable Project and the Potrero Power Plant Unit 7 Project.
- The No Project Alternative.

Appendix B describes alternatives that were eliminated from detailed consideration and presents an explanation of why these alternatives are not analyzed. Alternatives that were eliminated from detailed consideration are:

- Thirteen site alternatives (three sites are retained for full analysis).
- Two transmission alternatives (one transmission alternative is retained for full analysis).
- Renewable resources (solar, wind, biomass, tidal, geothermal).
- Demand side management.
- Distributed generation.
- Integrated resources alternative.

ALTERNATIVES Table 1 lists all alternatives identified in this analysis, and states whether each is considered for detailed evaluation.

ALTERNATIVES Table 1
Alternatives Considered

Alternative	Qualify?	If Not, Why Not?
TECHNOLOGY ALTERNATIVES		
Demand Side Management	No	Already factored into electrical system planning
Distributed Generation	No	Technological, market, and regulatory barriers, as well as feasibility and timeliness concerns. Some types could cause significant environmental impacts and would not be consistent with project objectives
Renewable Resources	No	Feasibility and availability concerns. Some types could cause significant environmental impacts and would not be consistent with project objectives
Integrated Resource Alternative	No	Feasibility and reliability concerns
ALTERNATIVE SITES		
Applicant's Alternative Sites		
Cesar Chavez Site	No	No environmental benefit compared to proposed
Mirant Site	**Yes**	Considered as Potrero Power Plant Unit 7 in Appendix A
Illinois Street Site	No	No environmental benefit compared to proposed
Pier 70 Site	No	Greater impacts to historic resources; closer to residences
Western Pacific Site	No	Site would be laydown area for proposed SFERP; located on Port property with planned land use and public trust doctrine incompatibility issues
Larkin Substation vicinity	No	No space available
Mission Substation vicinity	No	No space available; proximity of residences
Hunters Point Substation vicinity	No	Proximity of residences
Alternative Sites Identified by the Public		
Smaller Sites	No	Insufficient space or generation capacity for 3 turbines; potentially greater impacts
SF Airport Area	**Yes**	Considered as SFIA Alternative in Appendix A
NRG Steam Plant (Fifth & Jessie Streets)	No	Nearby residences; insufficient space for 3 turbines; cost prohibitive
Treasure Island	No	Incompatible land use and inadequate infrastructure (transmission lines, natural gas)
The Presidio	No	Visual and recreation impacts, incompatible land use, lack of infrastructure; and policy inconsistency with NPS
Alternative Sites Considered in the SFEC FSA		
Innes Avenue	No	No environmental benefit compared to proposed
City Asphalt Plant	No	Too small for 3 turbines
SF Thermal Plant	No	Too small for 3 turbines
Hunters Point Power Plant	No	No environmental benefit; incompatible land use due to residences nearby
China Basin Stadium Site	No	Unavailable due to Mission Bay development underway
Mission Bay Development	No	Unavailable due to Mission Bay development underway
Rail Yard South of China Basin	No	Unavailable due to Mission Bay development underway
Cow Palace, Daly City	No	No environmental benefit (residential developments

Alternative	Qualify?	If Not, Why Not?
		now surround available land)
Treasure Island	No	Inadequate infrastructure (transmission lines, natural gas) and geotechnical concerns related to building on fill
Hunters Point Naval Shipyard	No	Development plans underway for residential and other uses
West of PG&E's Martin Substation, Daly City	No	Inadequate land now available due to residential development
Tuntex Site, Brisbane	**Yes**	Considered as Brisbane Alternative in Appendix A
Alternative Sites Considered in the Potrero Power Plant Unit 7 FSA		
Cargo Way Site	No	No environmental benefit compared to proposed
Gilman Avenue	No	Proximity of residences
Jamie Court, South San Francisco	No	Similar to SFIA Alternative
United Site at SFIA	**Yes**	Considered as SFIA Alternative in Appendix A
3Com Park Area: Carroll Avenue	No	No environmental benefit compared to proposed
South San Francisco: Belle Air Road	No	Inadequate land available
3Com Park, San Francisco	No	Timing of availability uncertain
Alternative Sites/Projects Identified by Staff		
East Bay Alternative, Hayward	**Yes**	Considered in Appendix A
Potrero Unit 7 Power Plant (as proposed by Mirant)	**Yes**	Considered in Appendix A
Trans Bay Cable	**Yes**	Considered in Appendix A

CONSIDERATION OF ALTERNATIVE SITES

BACKGROUND

During the CCSF's siting process, CCSF and the CA ISO engaged in discussions regarding reliable electricity service to CCSF and the requirements for closure of existing in-City generation. As a result of the correspondence, it is CCSF's position that the SFERP should clearly provide for closure of Hunters Point Power Plant (Units 1 and 4) in the event that the Jefferson-Martin transmission line[2] and related transmission projects are not placed in service. It is also CCSF's position that if the Jefferson-Martin line and associated transmission projects (set forth in a May 4, 2004, letter from PG&E to the CA ISO) provide for closure of the Hunters Point Power Plant (Units 1 and 4), then the SFERP should provide for closure of generating units at the existing Potrero Power Plant complex (SFERP 2004aa).

Prior to the May 4, 2004, letter, in making decisions about alternatives to site the SFERP, CCSF relied on the following four communications from the CA ISO, the first three of which are included in Appendix C to this Alternatives section:

1. An April 18, 2003, letter from CA ISO President and CEO Terry M. Winter to Theresa Mueller, Deputy City Attorney, City and County of San Francisco, and Kevin Dasso of PG&E;

2. An October 22, 2003, letter from CA ISO President and CEO Terry M. Winter to San Francisco Supervisor Sophie Maxwell;

[2] The Jefferson-Martin 230 kV Transmission Project was approved by the California Public Utilities Commission on August 19, 2004. Construction is underway and is expected to be completed in April 2006.

3. A matrix entitled "ISO Grid Planning Draft" forwarded by CA ISO staff to the San Francisco Public Utilities Commission (SFPUC) on February 9, 2004; and

4. A statement by CA ISO planning staff at a March 4, 2004, hearing before the City Services Committee of the San Francisco Board of Supervisors (SFERP 2004q).

The attachments to the April 18, 2003, and October 22, 2003, letters indicated that to allow for the shut down of units at Hunters Point Power Plant, the combustion turbines must be "electrically connected to the internal San Francisco 115kV transmission network."

The April 18, 2003, letter set forth the requirements to shut down Hunters Point Power Plant Unit 4, absent the Jefferson-Martin 230 kV Transmission Project, and indicates that four combustion turbines and six transmission projects would be required. The October 22, 2003, letter sets forth the requirements to shut down Hunters Point Power Plant Units 1 and 4, absent the Jefferson-Martin project, and indicates that four combustion turbines and eight transmission projects would be required. Furthermore, with both the SFERP and the Jefferson-Martin line in place, along with related transmission upgrades, the SFERP should, based on numbers set forth in the October 22, 2003, letter, at least provide for the additional closure of Potrero Units 4, 5 and 6.

The February 9, 2004, matrix indicates that Hunters Point Power Plant Units 1 and 4 could be shut down (absent the Jefferson-Martin transmission line), with three combustion turbines and the same eight other transmission projects. This information was confirmed by CA ISO planning staff at the March 4, 2004, hearing before the City Services Committee of the San Francisco Board of Supervisors. On May 28, 2004, San Francisco Mayor Gavin Newsom and Supervisor Sophie Maxwell wrote to CA ISO to request additional information about the ability to shut down in-City generation (including Potrero Power Plant Unit 3) in various scenarios. CCSF received a response to this letter on July 1, 2004 (from Jim Detmers, CA ISO Acting Chief Operations Officer to San Francisco Mayor Newsom, Supervisor Maxwell, and others; also included in Appendix C). CCSF has continued to forcefully press the CA ISO to define the conditions that would allow closure of Potrero Power Plant Unit 3.

In CCSF's data response to SF Power, they state that in a meeting between CCSF, community members and the CA ISO, the CA ISO agreed to engage in an expedited six-week process to define such preconditions. Further, on July 29, 2004, Greg Asay on behalf of Supervisor Maxwell reiterated to the CA ISO governing board CCSF's need for concrete and clear information from the CA ISO about the preconditions for closure of in-City generation. Although CCSF cannot guarantee that closure of all older in-City generation will in fact occur, it is the CCSF's objective in pursuing the SFERP to achieve this goal (SFERP 2004aa).

The efforts of CCSF and other stakeholders working with the CA ISO for three years culminated on September 10, 2004, in a presentation to the CA ISO Board of Governors of an Action Plan for San Francisco (SF Action Plan), which provides specific direction on how the old generation at Hunters Point and Potrero could be released from their RMR Agreements, ultimately leading to their retirement (SFPUC 2005a). At that time,

the SF Action Plan showed that the Potrero peakers (Units 4, 5, and 6) would be retired before Potrero Unit 3. The CCSF requested the CA ISO to consider the possibility of retiring Potrero 3 first, followed by the Potrero peakers. The CA ISO evaluated CCSF's request and concluded in October 2004 that this "switch" would be appropriate (DeShazo 2005).

Accordingly, the CA ISO revised the SF Action Plan and on November 10, 2004, the revised Plan was adopted by the Board. The Plan listed a combination of 14 transmission projects and 4 peaking power plants (including the proposed SFERP) that allow the following sequential shutdown of the existing generation (see additional discussion under No Project Alternative and **ALTERNATIVES Table 5** for a list of the required projects) (Edwards 2004a and 2004b):

- **Hunters Point Units 2 & 3**: Completion of one transmission project, which was completed by PG&E in December 2004. These units were released from their RMR Agreements on January 1, 2005.
- **Hunters Point Units 1 & 4**: Completion of seven transmission projects and the retrofit of Potrero Unit 3 (see below); the final project (Jefferson–Martin 230 kV Transmission Project) is scheduled for completion in March 2006. The RMR contracts would be terminated as soon as the remaining transmission projects are deemed completed and in operation (both by PG&E and the CA ISO).
- **Potrero Unit 3**: Completion of Peaking Power Plants (i.e., SFERP and one combustion turbine at the San Francisco International Airport) by CCSF; the scheduled completion is December 2006. Therefore, this unit is planned to be recommended for release from its RMR Agreement in September 2006 for the 2007 RMR Year.
- **Potrero Units 4, 5, & 6**: Completion of four transmission projects and assuming previous completion of the Peaking Power Plants referenced above; PG&E is currently evaluating the project completion dates, but believes they are likely to be scheduled for 2007. Were this to occur, the CA ISO would plan to recommend this units for release from their RMR Agreements in September 2007 for the 2008 RMR year.

PG&E and the CA ISO are implementing the SF Action Plan at this time and expect to be completed by the end of 2007.

ALTERNATIVES ANALYSIS COMPLETED BY THE APPLICANT

CCSF identified and assessed the suitability of several properties for the proposed project that could house different numbers of turbines. A 1998 survey indicates that only 14 percent of the land in the City is zoned as Industrial (SFERP 2004aa). As part of this assessment, it reviewed four siting options. These included siting all four combustion turbines at one site, siting three combustion turbines at one site and one combustion turbine elsewhere, siting two combustion turbines at one site and two elsewhere, and lastly, returning the combustion turbines to the State of California and not siting any combustion turbines (the No Project Alternative). After analyzing these options, CCSF determined that siting multiple combustion turbines at one site offered several advantages, most notably, lower capital and operating costs, and reduced permitting and construction schedules. However, in order to distribute the impacts of power generation

more equitably, the applicant decided to proceed with siting three units at the Potrero site and the fourth 48-MW unit at SFIA. The fourth turbine, known as the S.F. International Airport Power Plant (City of San Francisco Planning Department No. 2004.0384), would be located on approximately 2 acres at the corner of North Access Road and Clearwater Drive (SFIA Plot 20) on a projection of filled land known as North Field, approximately 3,100 feet from the existing United Cogeneration Plant, south of the SFIA Wastewater Treatment Plant and adjacent to and west of City College of San Francisco Aviation College (CCSF 2004).

Sites Near 115 kV Substations

To electrically connect at least three combustion turbines to the internal San Francisco 115 kV transmission network, CCSF staff concluded that considering possible line outages as well as interconnection costs, the best interconnection points would be at one of the existing PG&E 115 kV substations. There are four 115 kV substations in CCSF: Larkin, Mission, Potrero and Hunters Point. The **Larkin Substation** (located near the corner of Larkin and McAllister in the Civic Center area) was eliminated from consideration because there is no industrially zoned land in the vicinity.

While there is some industrial land adjacent to **Mission Substation** (located at Mission Street and 8th/9th Streets), the substation was eliminated from consideration to site three combustion turbines because there was insufficient land to locate multiple combustion turbines in the vicinity or for a construction lay down area, modifications, including seismic retrofits of the masonry buildings, would be necessary, and because of the expense of natural gas interconnection in the area. In addition, the Mission Substation is surrounded by commercial and residential land uses, with a low-income apartment building directly to the west of the site on Minna Street. Use of PG&E's Station I Site on the corner of 8th and Mission, diagonally across from the Mission Substation, was also eliminated for these reasons.

The **Hunters Point Substation** was eliminated from consideration due to environmental justice concerns and land use incompatibility with residences nearby. Specifically, CCSF notes that "communities in the vicinity of Hunters Point Substation (which is immediately adjacent to the Hunters Point Power Plant) have borne and continue to bear the impacts from substantial industrial activity, most notably the Hunters Point Power Plant and the SEWPCP" (SFERP 2004a and SFPUC 2005a). To ameliorate environmental justice concerns, it has been CCSF's objective since 1998 to close Hunters Point Power Plant. Given the longstanding impacts of the Hunters Point Power Plant on the local communities, and continued community concerns about the impacts from SEWPCP, CCSF did not consider siting new generation in the Hunters Point area.

In Section 9 of the AFC, the applicant identified and evaluated five alternative sites for the proposed power plant in the vicinity of the **Potrero Substation** (immediately west of the Potrero Power Plant which is approximately 0.5 miles north of the proposed SFERP site): the Cesar Chavez, Mirant, Illinois, Pier 70, and the Western Pacific Alternatives. Staff evaluates the Mirant Site (see Potrero Power Plant Unit 7 Alternative) in Appendix A. The other four sites were eliminated from detailed evaluation, primarily because they are not substantially different from the proposed site and offer no substantial environmental benefits. The specific reasons for elimination of each of these four sites are presented in Appendix B, Alternatives Eliminated.

Sites Not Near 115 kV Substations

In addition to the sites near the Potrero Substation, four other sites were considered and discarded during the planning and screening phase of the AFC. One of these sites was a multiple unit site: at the San Francisco International Airport (SFIA), east of the United Cogeneration facility. The City eliminated this site from further consideration because of indications from the CA ISO that it would not meet the CCSF's goal of shutting down existing in-City generation, in particular, the Hunters Point Power Plant. However staff retains this alternative for full analysis (see Appendix A).

Two other sites considered by CCSF were potential single-turbine sites located at the NRG Thermal plant near Fifth and Jessie Streets or at the SEWPCP. Neither of these sites is evaluated fully in this Staff Assessment; the rationale for their elimination is discussed in Appendix B, Alternatives Eliminated.

The third potential single-turbine site was located on Caltrans property near the Bay Bridge. Caltrans currently intends to use the site as a lay-down area for freeway off-ramp seismic improvements. The closest substation is the Embarcadero 230 kV Substation at 1st and Folsom Streets. To meet the siting criteria, a plant located at this site would have to interconnect to the Mission Substation. CCSF states that both electric and gas interconnection costs would be very expensive, construction costs would be expensive due to lack of a construction staging area, and that noise abatement and visual treatments would likely require either a high sound wall or enclosure. Therefore, this site was eliminated early in the screening process.

The AFC also discussed the feasibility of using Mirant's other Bay Area power plants (the existing Pittsburg and Contra Costa Power Plants). The AFC considered the No Project Alternative, transmission system alternatives, transmission interconnection alternatives, alternative generation technologies and configurations, alternative fuels, and alternative cooling system/water supplies. The AFC also presented a summary of the alternative sites evaluated in the SFEC proceeding.

Alternative Technologies

In addition to site alternatives, several potential NOx control technologies for combustion gas turbines were evaluated in the AFC (Section 9.6.1). The SCONOx combustion modification technology is not evaluated in this section but is considered in the Hazardous Materials Management section of this PSA.

The applicant also considered alternatives to Ammonia-based Emission Control Systems. These technologies are also evaluated in the Staff Assessment section on Hazardous Materials Management.

ALTERNATIVE SITES IDENTIFIED BY THE PUBLIC

On June 15, 2004, the Energy Commission held the Informational Hearing and Site Visit that begins its project review process. Several members of the public spoke during the public comment period in support of consideration of alternative sites, but no specific sites were suggested in that forum. In addition, Energy Commission staff met with various community members and groups to hear their concerns and solicit recommendations for alternative sites. Sites at the SFIA, Treasure Island, and the

Presidio were suggested as potential alternatives. The SFIA site is fully considered herein (see Appendix A), but the Treasure Island and Presidio sites are not evaluated in detail, as explained more fully in Appendix B, Alternatives Eliminated.

ALTERNATIVE SITES/PROJECTS IDENTIFIED BY STAFF

Based on CEQA requirements, staff's alternatives analysis was based on consideration of the following criteria:

1. An alternative should avoid or substantially lessen one or more of the potential significant effects of the project.
2. An ideal alternative location would be on the San Francisco Peninsula north of PG&E's Martin Substation.
3. A site should be at least 4 acres for the siting of three turbines (the shape of the site also affects its suitability).
4. The site should be within a reasonable distance of the electric transmission system, natural gas supply, and water supply.
5. The site should be available.
6. The site should not be located adjacent to moderate or high density residential areas, sensitive receptors (such as schools and hospitals), or recreation areas.

The second criterion above, that alternatives be located north of Martin Substation, resulted from a recent CA ISO analysis indicating that the entire Hunters Point Power Plant could be retired (a project objective) if at least three of the four combustion turbines available to San Francisco were located north of the Martin Substation. However, in order to provide the public and decisionmakers with analysis of a wide range of alternatives, staff has considered a broader geographic area for alternative sites, including one site south of Martin Substation (at SFIA) on the peninsula and one site in the East Bay.

From a long list of alternatives from current and previous projects (see **ALTERNATIVES Table 1**) and from field reconnaissance, staff identified five alternatives to be carried forward for detailed analysis:

- The Brisbane Alternative is on a vacant parcel in the City of Brisbane across the street from Martin Substation.
- The SFIA Alternative is at the north end of the SFIA on airport land adjacent to the United Airlines maintenance facility and cogeneration plant.
- The East Bay Alternative in Alameda County near the City of Hayward (near the site of the approved Russell City Energy Center, 01-AFC-7).
- The 530 MW Potrero Unit 7 Power Plant Project, a combined cycle project, as proposed by Mirant and as analyzed in the Final Staff Assessment published by the Energy Commission on February 13, 2002.
- The Trans Bay Cable Project, a transmission line between Pittsburg, in Contra Costa County, and the Potrero Substation.

Also, as required under CEQA, the No Project Alternative is also considered. Appendix A presents each of the six selected alternatives described in detail, including environmental and engineering analysis in all disciplines. Appendix B presents a discussion of the alternatives that were eliminated from detailed analysis.

SUMMARY OF IMPACTS OF ALTERNATIVES

ALTERNATIVES Table 2 presents a summary of the comparative impacts of the five alternative sites and projects with the proposed project. This table states whether the impacts of each site in each issue area result in that site being preferred to the proposed site or not. The Potrero Power Plant Unit 7 alternative has the potential for greatest impacts of all the alternatives. Of the four alternative sites evaluated, the Brisbane Alternative has the potential for greatest impacts and would have greater impacts in comparison with the proposed SFERP in the issue areas of noise, land use, traffic, visual resources, and water and soils, as well as issues relating to transmission system engineering and transmission safety and nuisance.

In addition, the Trans Bay Cable Project and the Brisbane, SFIA, and East Bay Alternatives would fail to meet a major project objective of closing down aging in-City generation (e.g., releasing Potrero Units 3 through 6 from applicable RMR contracts) because they would not be located within the CCSF, and would not meet CA ISO requirements for generation to be "north of Martin Substation." The Trans Bay Cable Project would likely have the least environmental impacts overall (primarily because, as a transmission project, its operational impacts would be minor) but construction of this project would result in greater impacts to aquatic biological resources, water and soil, traffic, geological resources, and transmission line safety and nuisance impacts.

Staff also believes that, overall, the No Project Alternative is not superior to the proposed project. The No Project scenario (described in Appendix A) would likely delay the closure of the Hunters Point Power Plant and Potrero Power Plant Units 3 through 6, which are objectives of the proposed SFERP and are older plants, which have relatively higher air emissions. The No Project Alternative would also result in reduced reliability for San Francisco's electrical supply.

ALTERNATIVES Table 2
Comparison of Impacts of Alternative Sites to the Proposed SFERP

Issue Area		Brisbane Alternative	SFIA Alternative	East Bay Alternative	Potrero Unit 7	Trans Bay Cable
Environmental Assessment						
Air Quality		Similar	Similar [for 3 turbines]	Similar	Less preferred	**Preferred**
Biological Resources	**Terrestrial**	Similar	Less preferred	Less preferred	Similar	Less preferred
	Aquatic	Similar	Less preferred	Less preferred	Less preferred (w/ once-through cooling) Similar (w/hybrid)	Less preferred
Cultural Resources		Similar	Slightly Preferred	Slightly Preferred	Similar	Less Preferred
Hazardous Materials Management		Similar	Similar	Similar	Less preferred	**Preferred**
Land Use		Less preferred	Similar	Similar	Less preferred	**Preferred**
Noise		Less preferred	Less preferred	Similar	Less preferred	**Preferred**
Public Health		Similar	Similar [for 3 turbines]	Similar	Less preferred	Similar
Socioeconomics		Similar	Similar	Similar	Similar	**Preferred**
Traffic and Transportation		Less preferred	**Preferred**	Similar	Less preferred	Less preferred
Transmission Line Safety and Nuisance		Less preferred	Depends on transmission line routing	Less preferred	Less preferred	Less preferred
Visual Resources		Less preferred	Similar	Similar	Less preferred	Similar
Waste Management		Similar	Similar	Similar	Less preferred	Slightly preferred
Water and Soils		Less preferred	**Preferred**	Similar	Less preferred	Less preferred

Issue Area	Brisbane Alternative	SFIA Alternative	East Bay Alternative	Potrero Unit 7	Trans Bay Cable
Worker Safety and Fire Protection	Similar	Similar	Similar	Similar	**Preferred**
Engineering Assessment					
Facility Design	Similar	Similar	Similar	Similar	Similar
Geology and Paleontology	Similar	Similar	Similar	Similar	Less preferred
Power Plant Efficiency	Similar	Similar	Similar	**Preferred**	No impact
Power Plant Reliability	Similar	Similar	Similar	Slightly less preferred	No impact
Transmission System Engineering	Less preferred	Less preferred	Less preferred	**Preferred**	Less Preferred

APPENDIX A: ALTERNATIVES EVALUATED IN DETAIL

Six alternatives are evaluated in this section, including three alternative sites for the three turbines proposed by CCSF, two alternatives to the SFERP project as a whole, and the No Project Alternative as required by CEQA. The alternatives are:

- Site Alternatives:
  - Brisbane Alternative
  - SFIA Alternative
  - East Bay Alternative
- Project Alternatives:
  - Potrero Unit 7 Power Plant
  - Trans Bay Cable
- No Project Alternative

Each alternative is described below, followed by analysis of the environmental impacts and engineering constraints of that alternative. **ALTERNATIVES Figure 1** shows the location of all of the alternatives that were evaluated. **ALTERNATIVES Table 2** on the previous page is a comparison table that summarizes the impacts of each alternative in each issue area.

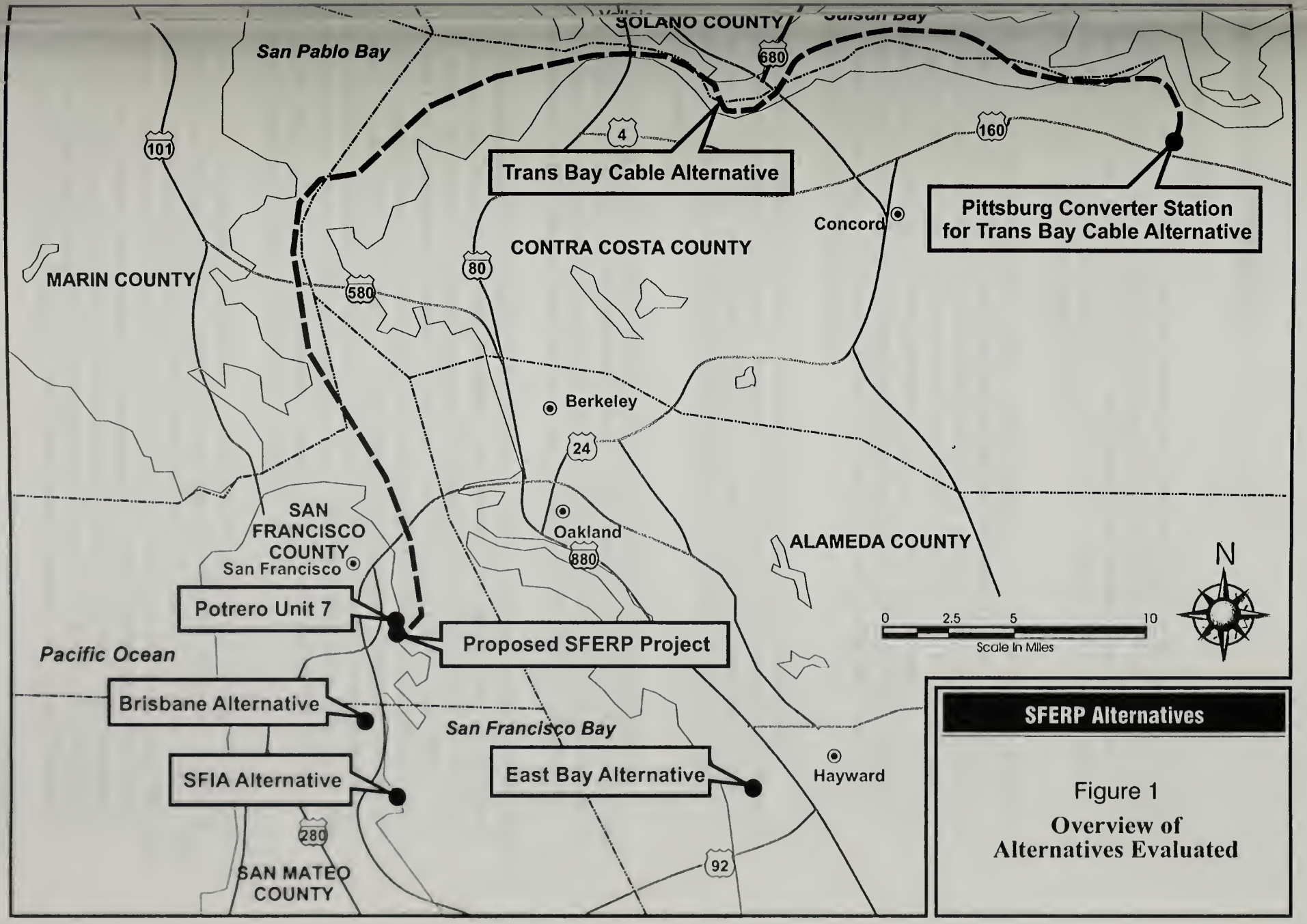


Figure 1

Overview of Alternatives Evaluated

BRISBANE ALTERNATIVE

Site Description

This site is owned by Sunquest Properties and is located within a large (approximately 180 acres) area of level, vacant land that was used by Southern Pacific Transportation Company for major railcar rehabilitation and locomotive maintenance operations from about 1914 to 1960. The site was purchased by the Taiwan-based firm Sunquest (formerly called Tuntex) Properties in 1990.

The site is located in Visitacion Valley, a basin tributary to the San Francisco Bay and an area of the City of Brisbane known as the Baylands Planning Area. The Bay is located about 2,000 feet east of the site, immediately east of Highway 101. The alternative site would be located northeast of the intersection of Bayshore Boulevard and Geneva Avenue. PG&E's Martin Substation is located on the southwest corner of the intersection. A Union Pacific railroad siding runs just east of and parallel to Bayshore Boulevard in the area of Geneva Avenue, and the proposed site location would be immediately east of the retired siding.

The entire area between Bayshore Boulevard and Highway 101 is vacant and undeveloped so adequate space is available. In this regard, the site would be adequate for either three or four gas turbines (though only the proposed three-turbine option is considered here). The switchyard would be oriented in the westerly direction facing Martin Substation.

The portion of the site located north and east of Geneva Avenue has undergone remediation for heavy metals contamination. A groundwater pump-and-treat system for this area was installed in October 1994. The site portion south of Geneva Avenue is still contaminated with hydrocarbons and is under control of the RWQCB (DTSC 2004).

The Brisbane General Plan calls for this site to be used for "Trade Commercial Planned Development" (TC/PD: for hotels, research, and development, etc.). This site is zoned M-1, which allows mixed-use and commercial development and the owner is working with the City of Brisbane to develop the property into large corporate-style, light-industrial uses. However, no development plans have been formally submitted for the property (Taylor 2004). The site's current zoning reflects a zone change to convert the site's historic M-1 industrial designation. Currently, general development guidelines do not support the location of heavy industrial uses on this site. Therefore, a General Plan amendment and a zoning change would be required to accommodate the siting of power generating facilities at this site (CEC 2002a).

To the west of the site are commercial and service commercial uses along Bayshore Boulevard and Geneva Avenue. Also, the Cow Palace, a regional exhibition facility, is located 0.6 miles west of Bayshore Boulevard on the south side of Geneva Avenue. The land use character of the immediate alternative site area is predominantly industrial, due to the existing electric transmission infrastructure (i.e., Martin Substation) west of the site and the adjacent and nearby light-industrial and heavy industrial uses. However, numerous single-family residences and two elementary schools are located in Daly City to the west in the vicinity of this site. The closest residences are at Talbert Street and

MacDonald Avenue, one block west of Bayshore Boulevard (approximately 2,000 feet), and the closest school is approximately 0.4 miles to the west.

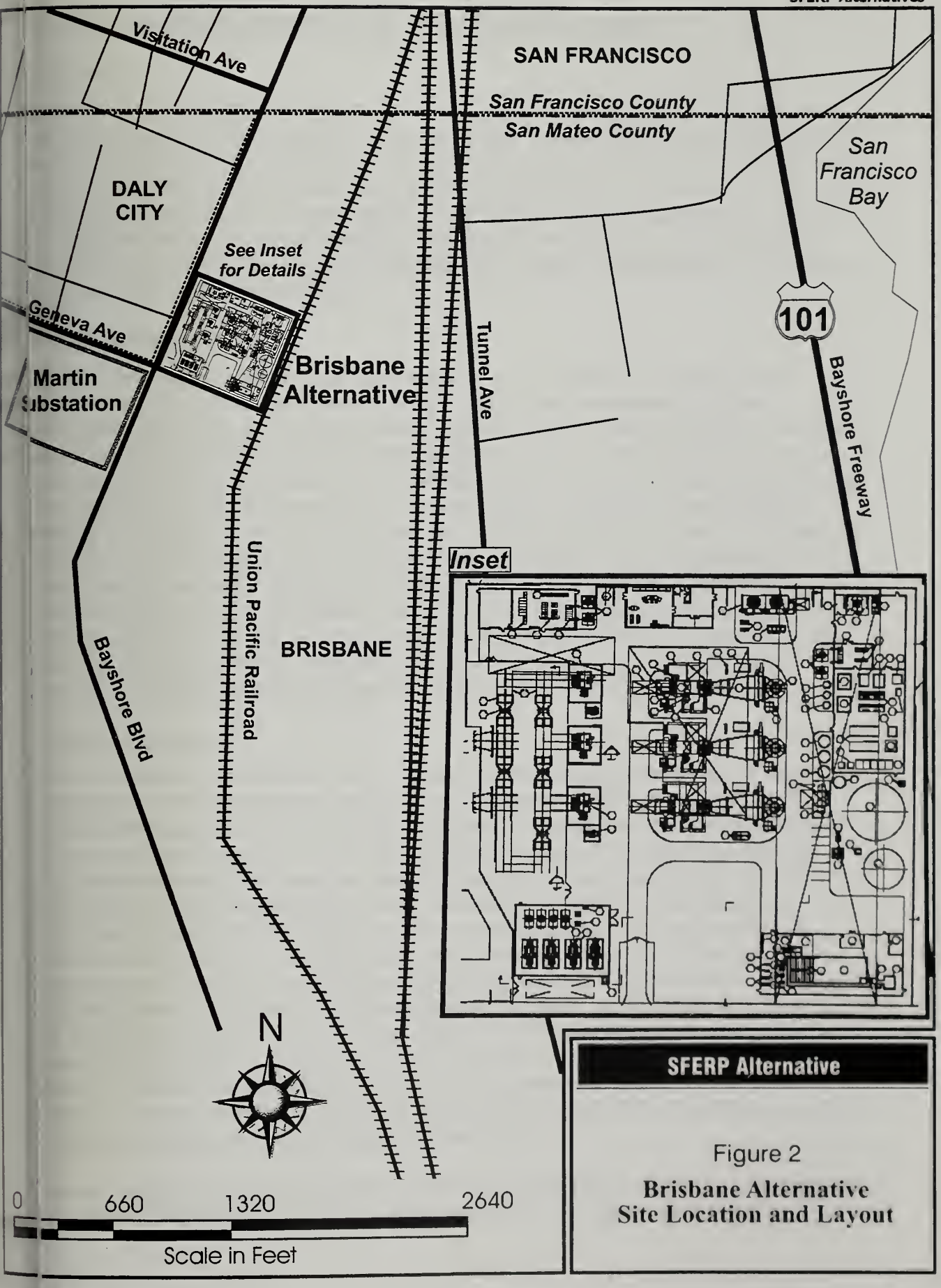
Infrastructure Availability

The City of Brisbane purchases its water from CCSF's Southeast Water Pollution Control Plant (SEWPCP) (located approximately 3 miles north of this site). The sewer main to this facility, which is operated by the Bayshore Sanitary District, runs north from the Carlyle Pump Station at Industrial Avenue along Bayshore Boulevard adjacent to the Brisbane Alternative Site. Therefore, water for this alternative site could be obtained by tapping into the 14-inch force main in Bayshore Boulevard and there is adequate space available to include a treatment facility onsite, as would be installed for the proposed project. Discharge of wastewater would require permits from both the Bayshore Sanitary District and the SFPUC.

A 13.8 to 115 kilovolt (kV) step-up transformer for each unit and 115 kV on-site switchyard would be required. A new 115 kV overhead or underground transmission line would run from the plant switchyard across Bayshore Boulevard to PG&E's Martin Substation, a distance of approximately 600 feet. This line would interconnect to Martin Substation at 115 kV at a location within the substation to be designated by PG&E.

Fuel gas would be supplied from a PG&E gas pipeline in Bayshore Boulevard. Less than 600 feet of new gas pipeline would be required to connect the plant site to the PG&E line (CEC 2002a). Gas compression will be required at the site to provide correct operating pressure for the gas turbines.

ALTERNATIVES Figure 2 shows the likely location and layout of the generating facility within the Brisbane Alternative site.



SFERP Alternative

Figure 2

Brisbane Alternative
Site Location and Layout

Environmental Assessment for Brisbane Alternative

Air Quality

Emissions from the Brisbane Alternative would need to be controlled to satisfy the air permitting requirements of the Bay Area Air Quality Management District (BAAQMD). As such, construction and operation of SFERP at the Brisbane site would be subject to permit requirements and it would require Energy Commission mitigation, similar to that of the proposed project, to avoid significant air quality impacts. Appropriate mitigation at the Brisbane site would likely involve similar, locally-oriented recommendations to reduce PM10 impacts. As a result, mitigated power plant emissions would be the same as those of the proposed SFERP.

Biological Resources

The Brisbane site is a vacant, sparsely vegetated and disturbed lot with historic industrial use, in a developed area. The soil surface has been disturbed and compacted, and there is no surface water present. Field reconnaissance for biological resources previously conducted by staff identified no occurrences of threatened or endangered species on or adjacent to the site (CEC 2002a). Vegetation is sparse and cover is limited to herbaceous plants. No native trees, riparian or other sensitive habitats or vegetation are on or near the site. This site is approximately 0.5 miles west of the Bay shoreline, which in this area includes intertidal mudflats. Because of the developed surroundings, there appears to be little or no opportunity for wildlife movement among patches of better habitat. As with the proposed project, storm water runoff management would be appropriate to avoid impacts to surface waters. If the project were located at this alternative site, it would have similar NOx emission concerns for effects on biological resources as the proposed project site.

Cultural Resources

Records searches and detailed site surveys for cultural resources have not been completed for the Brisbane site, but during a pedestrian field survey, no historic structures were apparent on the area proposed for use for this alternative. Adjacent buildings and structures were not evaluated to determine if they met the eligibility requirements for the California Register of Historical Resources (CRHR). Previous assessment of the Brisbane site by staff indicates that there is a potential for encountering prehistoric sites, because the site is located on or near the original shoreline (CEC 2002a). Two prehistoric sites were previously identified along the original shoreline within one-half mile of the Brisbane site. One of these (P-41-000496) is located within 1,000 feet and contains human remains. Additionally, the foundations of a historic period dairy barn (CA-SMA-326H) are located within 0.5 mile of the property (CEC 2002a). These known sites could be avoided with proper mitigation and oversight. Buried cultural resources may also be present in the vicinity of linear facilities. Compared to the SFERP site, developing the SFERP at the Brisbane site would have a similar impact on historical resources.

To avoid impacts potentially caused by disturbing buried cultural and historic resources at the Brisbane site, oversight of a cultural resources specialist would likely be

necessary during construction; however these potential impacts would be similar to those associated with the proposed project site.

Hazardous Materials Management

Hazardous materials use at the Brisbane site, including the quantities handled during transportation and disposal, would be identical to the proposed project. Transportation of hazardous materials to the Brisbane site would occur approximately two to three blocks from residences, which are located to the west across Bayshore Boulevard. The transportation route from Highway 101 would be through industrial, commercial, or open space areas. Compared to the proposed project, selecting the Brisbane site would result in similar impacts from transportation of hazardous materials, due to the similar proximity to homes to the site and to the transportation route. No special measures related to hazardous materials management would be required for this alternative site, and impacts during operation would be similar.

Land Use

The Brisbane site is located within an area of the City of Brisbane known as the Baylands Planning Area. The site is on a level, vacant parcel that previously served as a rail freight yard. A portion of the site north of Geneva Boulevard has undergone remediation for heavy metals, and hydrocarbon contamination may be present on lands located immediately to the south (DTSC 2004). Northwest of the site are non-operating commercial and industrial facilities, and east of site are industrial facilities including resource recovery (recycling) operations. West of the site are commercial and service uses along Bayshore Boulevard and Geneva Avenue. The land use character of the area can be described as predominantly industrial due to the existing electric transmission infrastructure (i.e., Martin Substation). However, numerous single-family residences and two elementary schools are located in Daly City to the west in the vicinity of this site. The closest residences are at Talbert Street and MacDonald Avenue, one block west of Bayshore Boulevard (approximately 2,000 feet), and the closest school is approximately 0.4 miles to the west.

Staff previously assessed the designation of the Brisbane site and found that it is zoned C-1, which allows mixed-use and commercial development. This designation is more restrictive than an industrial designation. The Brisbane General Plan designates the area as Trade Commercial Planned Development (PD/TC), and the general development guidelines do not support the location of heavy industrial uses in this area (CEC 2002a). Therefore, a General Plan amendment and a zone change would be required to accommodate the SFERP at this site. This represents an inconsistency with applicable plans and policies. As such, when compared to the proposed project, this alternative site would be more likely to create a significant land use impact because of the potential conflict with the policies of the City of Brisbane.

Noise

The residences nearest to the Brisbane site are approximately 2,000 feet to the west, across Bayshore Boulevard. This alternative site lies within the City of Brisbane and would be subject to the Noise Element of the City of Brisbane General Plan and Chapter 8.28 of the City of Brisbane Municipal Code. Compliance with the Brisbane Noise Element would likely be achieved with economical mitigation features. However,

introduction of SFERP at this site would introduce noise levels that could be incompatible with future use of the area under its zoning designation for mixed-use and commercial development. The feasibility of future development of adjacent properties for mixed uses would be adversely affected. Because of this potential land use incompatibility, this alternative would cause greater operational noise impacts than the proposed project. Construction noise would cause impacts similar to those expected at the SFERP site.

Public Health

The air pollutants emitted by the SFERP at the Brisbane site would be identical to those that would occur at the proposed project site. As such, the project's emissions of toxic air contaminants would not be likely to expose the surrounding population to any significant risk of cancer or non-cancer health effects.

Socioeconomics

Staff estimated the benefits from the SFERP project should it be built at the Brisbane site. Benefits include increases in sales taxes, employment, and income for San Mateo County and neighboring counties (see **SOCIOECONOMICS Table 2** for data and information). Staff finds that the SFERP project will not cause a significant adverse socioeconomic impact on the study area's housing, schools, police, emergency services, hospitals, and utilities. Based on staff's demographic screening analysis, the minority population within six miles of the Brisbane Alternative is about 35 percent, and within one mile it is about 22 percent; however, there are individual census blocks with greater than 50 or 75 percent minority population. The low-income population within six miles is slightly more than 6 percent and within one mile is slightly less than 5 percent. In comparison, based on staff's demographic screening analysis for the proposed SFERP project, the minority population within six miles of the proposed power plant site at Potrero is less than 57 percent and the low-income population within six miles is slightly above 11 percent.

Staff finds that there would be no adverse socioeconomic impacts since most of the construction and operation workforce is within the regional or local labor market area and construction activities are short-term. Staff has determined that there would be no significant adverse direct or cumulative socioeconomic impacts and, therefore, there are no socioeconomic environmental justice issues. The Brisbane Alternative would be consistent with the applicable socioeconomic LORS.

Traffic and Transportation

The Brisbane site can be accessed from Bayshore Boulevard west of the site or Tunnel Avenue east of the site. Although the site is located in an industrial area, Bayshore Boulevard and Tunnel Avenue are primarily used for through traffic to residential and local commercial uses. There is no port facility or rail service to this site (CEC 2002a). Similar to the proposed project, before construction could occur at the Brisbane site, a construction traffic control and transportation demand implementation program would need to be developed in coordination with the City of Brisbane, San Mateo County, and Caltrans. These programs would limit construction-period truck and commute traffic to off-peak periods and avoid potential traffic and transportation impacts. Because of the

high level of through-traffic on the access roadways, this site would cause greater impacts to traffic and transportation than the proposed project.

Transmission Line Safety and Nuisance

Power generated at the Brisbane site would travel from the on-site switchyard to the adjacent Martin Substation via a short overhead or underground transmission line across Bayshore Boulevard. Similar to the proposed project, this alternative would not be likely to cause transmission line safety hazards or nuisances. However, the length of the proposed project line would be approximately 300 feet compared to the 600 feet to be used for the Brisbane alternative, showing the proposed project line as preferable in terms of the total length of the source of line fields to which individuals might be exposed.

Visual Resources

Observation points for the Brisbane site include the ridges of Visitacion Valley, south, west, and north of the site. Residential areas north and west of the site (within about 0.5 miles) and on San Bruno Mountain to the southwest, and McLaren Park (about 0.7 miles to the northwest) provide numerous opportunities for foreground and middle-ground viewing of the site. There are few structures of notable height surrounding the site. Based on previous staff assessment for this site (CEC 2002a), staff found that the power plant would introduce a high level of contrast because of the general absence of surrounding tall structures and that the power plant would introduce a co-dominant to dominant feature, especially when viewed from the higher residential areas and surrounding hills, including McLaren Park. Staff also found that view blockage of wetland and Bay landscapes would be moderate. These effects would cause significant visual impacts that would be more severe at this site than they would be at the proposed project site.

Waste Management

Construction at the Brisbane site would require excavation of fill material that underlies the site. There is a history of contamination from heavy metals and hydrocarbons at this site and at adjacent properties (DTSC, 2004).

The project will produce minimal maintenance and plant wastes typical of power generation operations. An outside contractor will remove all generated wastes to the contractor's establishment for ultimate disposal. Generation plant wastes include: oily rags, broken and rusted metal and machine parts, defective or broken electrical materials, empty containers, and other miscellaneous solid wastes, including the typical refuse generated by workers. As with the proposed project, all construction and operation activities would need to be conducted in compliance with regulations pertaining to the appropriate management of wastes. Similar to the proposed project, the project would need to implement a comprehensive program to manage hazardous wastes and obtain a hazardous waste generator identification number (required by law for any generator of hazardous wastes). The environmental impact of waste disposal would be similar to the proposed project.

Water and Soils

The Brisbane Alternative and surrounding properties have a history of groundwater and soil contamination from heavy metals and hydrocarbons. Site remediation is ongoing in the vicinity, and contamination is known to remain on adjacent properties. The extent of the remaining contamination is unknown. Mitigation measures would need to be developed to ensure proper testing, treatment, and disposal during construction and site preparation. This would likely involve participation of the San Francisco Bay Regional Water Quality Control Board and the County of San Mateo Health Department.

Plans for grading and erosion control, dewatering, and storm water pollution prevention would also need to be reviewed by local agencies, including the San Francisco Bay Regional Water Quality Control Board, the City of Brisbane Public Works Department. Additionally, this site is in the vicinity of a nearby landfill, which means the County of San Mateo might have provisions related to earthmoving. The plans, procedures, and measures needed to address potentially adverse site conditions would generally be similar to those necessary for the proposed project.

Water for process and domestic uses would likely be obtained from the City of Brisbane or via direct connection to SFPUC facilities. Wastewater would be handled in a similar manner as the proposed project by being treated and discharged to the local sewer or to the SEWPCP.

Worker Safety and Fire Protection

The Brisbane site would be located within an area that is designated for mixed uses. The area is currently served by the San Mateo County, North County Fire Authority. The fire risks of this alternative would be similar to those of the surrounding existing uses, including the Martin Substation, and thus would pose no new or different demands on local services.

Similar to the proposed project, it would be appropriate for a power plant at this site to provide a Project Demolition and Construction Injury and Illness Prevention Program and a Project Operations Safety and Health Program in order to ensure adequate levels of industrial safety. Also similar to the proposed project, the local fire department would be contacted to assure that the level of staffing, equipment, and response time for fire services and EMS are adequate.

Engineering Assessment for Brisbane Alternative

Facility Design

The project's facility design at the Brisbane site would be similar to that of the SFERP at the proposed project site. As with the proposed project, staff-recommended measures may be appropriate to ensure compliance with engineering laws, ordinances, regulations and standards applicable to the design and construction of the project.

Geology and Paleontology

The Brisbane site overlies land created when the tidal flats and marshes along the margin of San Francisco Bay were reclaimed by the placement of fill. The fill probably

consists of debris and construction rubble and is believed to be underlain by variable thickness of young Bay mud and Bay-Side Sand. Strong seismic ground shaking (peak ground acceleration of 0.6 to 0.7g) may occur at the site in the next 50 years, although no active faults are known to cross the site. Pile foundations would likely be required throughout this site. Adequate design parameters for the facility would need to be determined through a site specific evaluation by a Certified Engineering Geologist or Geotechnical Engineer.

Impacts due to seismic hazards and soil conditions would need to be mitigated by complying with the requirements and design standards of the California Building Code. Based on previous staff assessment for this site (CEC 2002a), impacts to geologic and paleontological resources would not be expected. Mitigation of potential impacts to paleontological resources could be accomplished with construction monitoring by a resource specialist and salvaging of any identified fossils. These impacts and the measures for mitigation would be similar to those of the proposed project.

Power Plant Efficiency

The plant configuration and combustion turbine generator technology that would be employed at the Brisbane site would be similar to the proposed project, which means it would result in similar consumption of fuel, and it would result in a similar level of efficiency.

Power Plant Reliability

The plant configuration at the Brisbane site would be similar to the proposed project, which means it would result in similar levels of equipment availability. Plant maintainability, fuel and water availability, and reliability of the plant in relation to natural hazards would each be similar to the proposed project.

Transmission System Engineering

The Brisbane site would not be located within the CCSF, and would not meet CA ISO requirements for generation to be "north of Martin Substation". Locating SFERP in San Mateo County would require reevaluating the capacity of the Martin Substation and its transmission links to PG&E substations north of Martin within the CCSF. Compared to the proposed project, this alternative would likely cause adverse effects to the transmission system because constraints on the links to PG&E substations north of Martin would be exacerbated. Moreover, it would not accomplish the project goal of providing sufficient new in-City generation that would allow for closure of older Hunter's Point and Potrero facilities.

SAN FRANCISCO INTERNATIONAL AIRPORT (SFIA) ALTERNATIVE

Background

This site was the subject of two Energy Commission proceedings in 2001:

- A 51 MW peaker power plant proposed by El Paso Energy Company (United Golden Gate Power Plant, Phase I) was approved for this site by the Energy Commission in March 2001. This project was never constructed due to unresolved land lease

contract issues and its approval has expired (CEC 2004 - Energy Commission Energy Facilities Status).

- El Paso Energy Company submitted an AFC (01-AFC-3) to the Energy Commission in March 2001 to construct United Golden Gate Power Plant, Phase II, a proposed 570 MW power plant, adjacent to the existing United Cogeneration Inc. facility. This combined cycle plant would have replaced the simple-cycle Phase I power plant. However, the application is currently on hold because the applicant has not obtained site control (CEC 2004 - Energy Commission Energy Facilities Status).

While these two projects have encountered difficulties with site control, the site is on the San Francisco International Airport (SFIA) property, and therefore, is within the jurisdiction of the CCSF. CCSF is currently planning to use SFIA property to site one of the four combustion turbines that it would receive from the Williams Settlement (CCSF 2004). This project, known as the San Francisco International Airport Combustion Turbine Project (SFIACTP), is proposing to use a 2-acre lot that currently houses bulk materials and temporary construction trailers and is located near the San Francisco Bay on a projection of filled land known as North Field, approximately 0.6 miles east of the SFIA Alternative site.

There would not be enough space for all four turbines at the proposed SFIACTP site, which is situated on the corner of North Access Road and Clearwater Drive, south of the SFIA Wastewater Treatment Plant. However, given the proximity of the two sites, both of which are located on SFIA property, if the SFIA Alternative site were used then all four turbines would most likely be sited at the SFIA Alternative site together. Therefore, the analysis of this alternative considers that all four turbines would be installed at this alternative site.

Site Description

The SFIA Alternative is located near the San Francisco Bay, approximately 9.3 miles south-southeast of the CCSF. The alternative site is located south of the intersection of North Access Road and Coast Guard Road on SFIA property. The site is immediately east of the United Airlines Maintenance and Operations Center (UMOC) and the United Cogeneration Inc. (UCI) cogeneration power plant. The site is level and paved and is currently used as a parking lot by UMOC employees. There would be adequate space on the 11-acre site for a four turbine installation, retaining a portion of the existing parking lot for its current use.

Airport facilities are located on the east, south, and west sides of the site. North of the site across North Access Road are additional airport facilities, shoreline wetlands, the Safe Harbor Homeless Shelter (located approximately 500 feet from the site), and the County of San Mateo Transit Bus Yard. Immediately west of the homeless shelter and adjacent to the shoreline wetlands is a picnic area and a walking trail. On the west side of the shoreline wetlands are several large jet fuel storage tanks, and silos containing the City of South San Francisco's sewage discharges (CEC 2002a). Generally, the land use character of this area is predominantly industrial due to the adjacent maintenance, fueling, and cogeneration facilities. Aside from the shelter, the next nearest residences are approximately 10 blocks to the north and west, west of Highway 101 (approximately 1 mile from the site).

The site is zoned Planned Industrial (P-I) by the City of South San Francisco. This zoning allows for the development of a steam power plant. The SFIA itself has no zoning designations (UGGPC 2001)

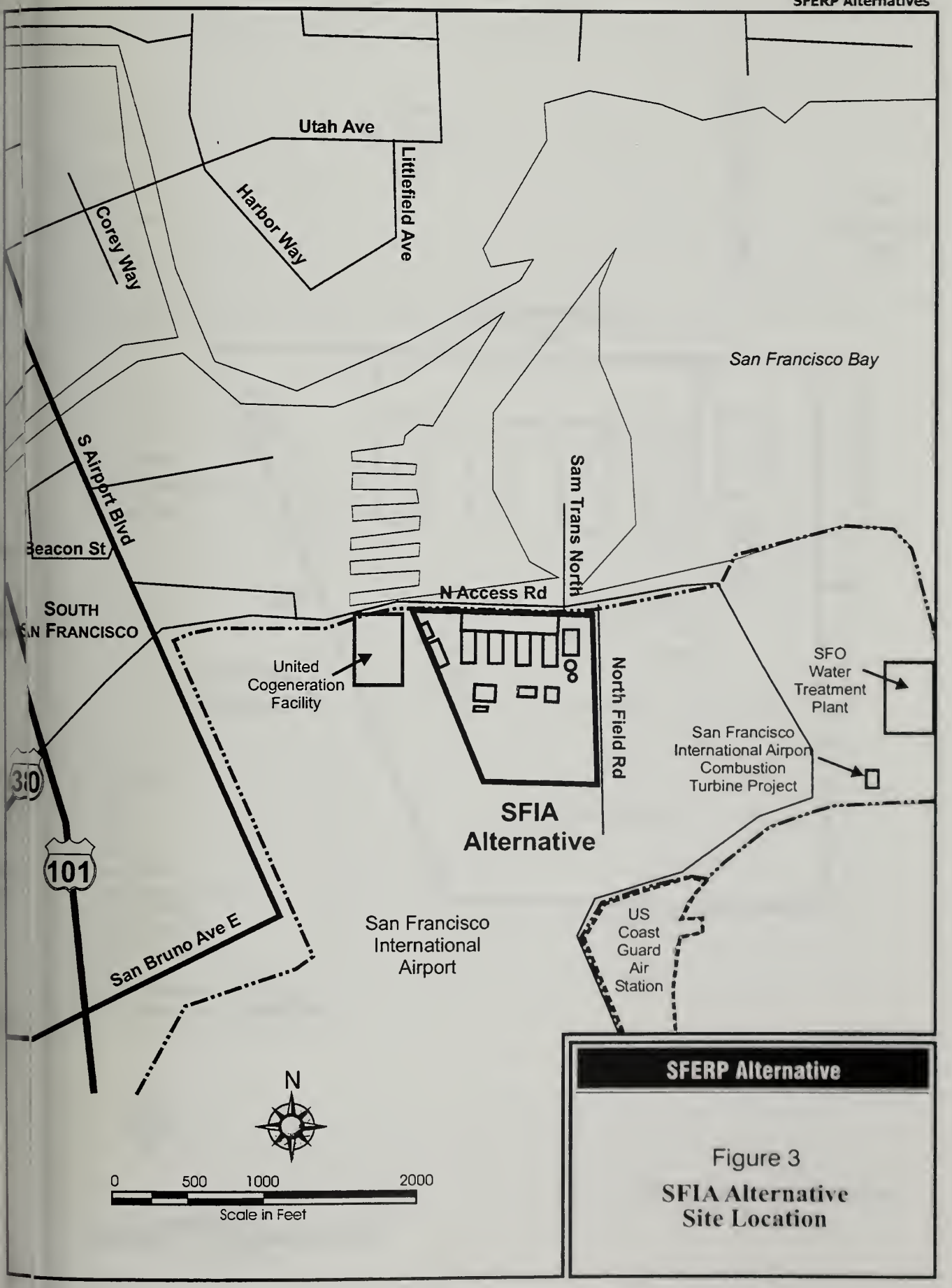
Infrastructure Availability

This alternative site is approximately 1 mile from the newly expanded SFIA Wastewater Treatment Plant on Clearwater Drive (off of North Access Road), which has a total wastewater treatment capacity of 3.22 million gallons per day. Secondary treated effluent may be obtained for plant process uses. This would substantially reduce the space and capital cost required for onsite water treatment facilities. Minimal filtering would be required for basic process water such as cooling tower makeup. Water for injection into the turbine (NOx and Sprint systems) must be de-ionized, so this treatment step would still be required.

Natural gas fuel could be supplied by a connection to PG&E's gas Line 101 near the intersection of South Airport Boulevard and North Access Road. Approximately 2,100 feet of new pipeline would be required to connect Line 101 to the project site. The new pipeline would parallel North Access Road in an existing ROW to the site. Gas compression will be required to provide adequate operating pressure for the combustion turbine. The natural gas interconnection could also be approximately 1 mile from the site at South Airport Boulevard and San Bruno Avenue (SFERP 2004q).

For this site, the electrical interconnection could either be at the East Grand substation, approximately 1.5 miles from the plant on Grand and Gateway in the City of South San Francisco (SFERP 2004q) or via the existing UCI cogeneration facility has a single-circuit 115 kV overhead transmission line that serves the UCI facility and connects with the San Mateo-Martin Circuit No. 5. Each turbine-generator for the alternative would have a dedicated unit transformer feeding a new 115 kV switchyard at the alternative site. To tie into the existing single-circuit 115 kV line for the UCI facility, the switchyard would likely connect to the San Francisco Airport Substation (BA) at 115 kV via two circuits in duct banks and conduits about 6,700 feet long.

ALTERNATIVES Figure 3 shows the location of the SFIA Alternative, and **ALTERNATIVES Figure 4** shows the layout of the generating facility within the site.



SFERP Alternative

Figure 3

SFIA Alternative Site Location

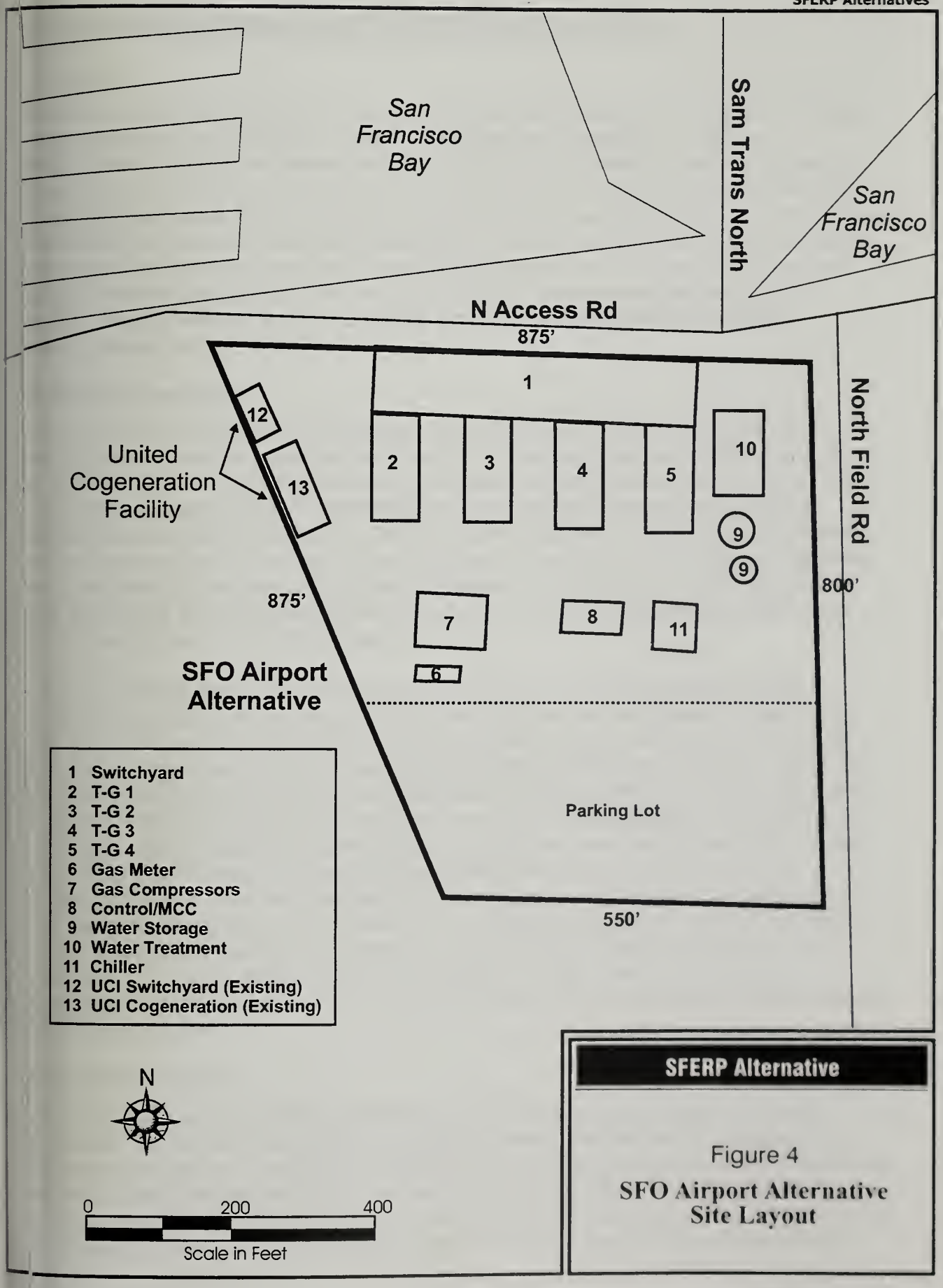


Figure 4

SFO Airport Alternative Site Layout

Environmental Assessment for SFIA Site Alternative

Air Quality

Emissions from this alternative would need to be controlled to satisfy the air permitting requirements of the BAAQMD. Power plant emissions, therefore, would be approximately 25 percent greater with the addition of the fourth turbine but the use of three turbines would have the same emissions as the proposed project. Regardless, impacts would be similar to the proposed project, because construction and operation of the SFERP at the SFIA site would be subject to similar permit requirements and similar mitigation requirements from the Energy Commission in order to avoid significant air quality impacts. Appropriate mitigation at the SFIA Alternative would likely involve similar, locally-oriented recommendations for reducing PM10impacts as those recommended for the SFERP.

Biological Resources

The SFIA site is a developed parking lot. The impervious surface of this site offers negligible to no habitat resources on the site. The nearest available habitat is the San Bruno Slough marsh located on the opposite side of North Access Road, approximately 75 to 100 feet north of the SFIA Alternative. Field reconnaissance for biological resources previously conducted by staff observed waterfowl, cord grass, pickleweed, and saltgrass at the marsh, and no occurrences of threatened or endangered species on or adjacent to the site (CEC 2002a). However, the California clapper rail (federal and state listed Endangered) is likely to occur in the coastal salt marsh habitat of San Bruno Slough north of the SFIA Alternative site.

Locating SFERP at this site could result in indirect off-site impacts to terrestrial biological resources at the nearby marsh from noise and air emissions. However, this site is located near the airport, adjacent to an existing cogeneration plant and a road that causes considerable continuous and intermittent noise during the day. Therefore, the additional noise from SFERP at this location would be unlikely to cause a significant increase in noise disturbance to biological resources. If the project were located at this alternative site, it would have similar NOx emission concerns as the proposed project site. Air pollutant emissions, such as dust during construction that may not be dispersed beyond the immediate vicinity of the marsh would need to be controlled. As with the proposed project, storm water runoff management would also be essential to avoid impacts to the surface water and the nearby marsh habitat. Because of the proximity of the SFIA Alternative to the San Bruno Slough, the overall impacts to biological resources would likely be greater than those that would occur at the proposed SFERP project site.

Cultural Resources

Records searches and detailed site surveys for cultural resources have not been completed for the SFIA Alternative, but during a recent pedestrian field survey, no historic structures were apparent on this parcel. Adjacent buildings and structures were not evaluated to determine if they met the eligibility requirements for the CRHR. Previous assessment of the SFIA Alternative by staff indicates that it has a low potential for prehistoric sites, and that no cultural resources have been previously recorded on

the site (CEC 2002a). The U.S. Coast Guard Air Station San Francisco, approximately 0.5 miles from the airport site, includes several buildings that have been found eligible for listing on the National Register of Historic Places (UGGPC 2001). Buried archaeological and prehistoric cultural resources may be present at the site and in the vicinity of linear facilities. Compared to the SFERP site where there would be the potential for vibration impacts on historic buildings within one block on either side of the proposed trenching required for the underground transmission line, developing SFERP at the SFIA site would fewer impacts on historical resources.

To avoid impacts potentially caused by disturbing buried and historic resources at the SFIA Alternative, mitigation requiring oversight of a cultural resources specialist would likely be necessary; however, potential impacts would be similar to those associated with the proposed project site.

Hazardous Materials Management

Hazardous materials use, including the quantities handled during transportation and disposal, would be identical to the proposed project. The nearest residence is 10 blocks away, but the Safe Harbor homeless shelter is located 500 feet to the north across the North Access Road. The transportation route would be approximately 0.5 miles from Highway 101 and Interstate 380 along the North Access Road, where no residential areas occur. Compared to operation of the proposed project at the Potrero site, impacts from transportation of hazardous materials would be reduced by this alternative because of the lack of proximity to residences. No special measures related to hazardous materials management would be required for this alternative site, and other impacts during operation would be similar.

Land Use

The SFIA Alternative is surrounded by airport facilities with shoreline wetlands, the Safe Harbor Homeless Shelter (located approximately 500 feet from the site), and the County of San Mateo Transit Bus Yard generally to the north. The Safe Harbor Shelter is a 90-bed emergency homeless shelter for individuals 18 years and older on a first-come, first-served basis. Therefore, in general the residents of the shelter are transient and would not be subjected to long-term exposure of project construction and operation. Immediately west of the homeless shelter and adjacent to the shoreline wetlands is a small picnic area and a walking trail. Generally, the land use character of this area is predominantly industrial due to the airport-related adjacent maintenance, fueling, and cogeneration facilities.

SFIA has no zoning ordinances and the City of South San Francisco has jurisdictional oversight within the northern portion of SFIA (UGGPC 2001). Therefore, SFIA would be within South San Francisco's zoning subarea. Staff previously assessed the designation of the SFIA Alternative and found that it is designated mixed industrial by the South San Francisco General Plan with a 161-foot height limit for structures according to the General Plan's Airport Related Height Limitations (CEC 2002a). Although the designation provides for industrial use, industries producing substantial amounts of hazardous waste or odor and other pollutants are not permitted under the mixed industrial designation. The proposed height of the SFERP stacks would conform

to this height limit, and, given the adjacent cogeneration facility, use of the SFIA Alternative for SFERP would likely be consistent with other applicable land use policies.

Although the site would be less than one mile from the runways of San Francisco International Airport, it would be located north of the east-west runway and thus would not be located on the extended runway centerline. Therefore, thermal and visible plumes from the facility would not likely cause land use incompatibility with aircraft operations or cause aviation safety impacts. However, the Airport Land Use Commission for the San Francisco International Airport would need to make a determination on consistency with the Airport's Comprehensive Land Use Plan. In addition, a Notice to Airmen may also be required advising pilots to avoid overflight of the power plant.

The proximity of this site to the Safe Harbor Homeless Shelter is a concern despite the transient nature of most of the residents. Although this shelter is located in a heavy industrial area and is likely affected by the existing surrounding airport-industrial uses, development of new power generating facilities at this site may exacerbate impacts on this sensitive land use. Use of this alternative site for SFERP would create more disturbances to short-term occupants of the shelter and people using the adjacent recreation area, both of which is closer to the alternative site than any permanent residences are with respect to the proposed project site (CEC 2002a). However, unlike the proposed SFERP site, there are no permanent residences within a mile of the alternative site.

Noise

The SFIA Alternative is adjacent to the UCI cogeneration plant, and the general area is impacted by noise from aircraft operations at the SFIA. The only nearby sensitive noise receptors are about 500 feet away, at the Safe Harbor Homeless Shelter. For this alternative site, there is a possibility of causing significant noise impacts to the residents of the nearby shelter. Compared to the proposed project, this alternative would cause greater operational noise impacts, and mitigating noise emissions to a level of insignificance would probably be more costly than at the proposed project site due to the proximity of the shelter. Construction noise would cause short-term impacts similar to those expected at the SFERP site.

Public Health

The air pollutants emitted by the SFERP at the SFIA Alternative would be approximately 33 percent greater with four turbines than the three that that would occur at the proposed project site. Use of three turbines would have identical emissions to the proposed project. Because the high-temperature exhaust of the combustion turbines would tend to carry the air pollutants far from the site, the Safe Harbor Homeless Shelter would not be adversely affected. As such, the project's emissions of toxic air contaminants would not be likely to expose the surrounding population to any significant risk of cancer or non-cancer health effects and impacts would be less than significant.

Socioeconomics

Staff has estimated the benefits from the SFERP project should it be built at the SFIA Alternative site. Benefits include increases in sales taxes, employment, and income for

San Francisco and neighboring counties (see **SOCIOECONOMICS Table 2** for data and information). Staff finds that the project will not cause a significant adverse socioeconomic impact on the study area's housing, schools, police, emergency services, hospitals, and utilities. Based on staff's demographic screening analysis, the minority population within six miles of the SFIA Alternative is about 64 percent and within one mile the minority population is about 76 percent. The low-income population within six miles is slightly less than 6 percent and slightly more than 2 percent within one mile. In comparison, based on staff's demographic screening analysis for the proposed SFERP project, the minority population within six miles of the proposed power plant site at Potrero is less than 57 percent (52 percent within one mile) and the low-income population within six miles is slightly above 11 percent.

Staff finds that there would be no adverse socioeconomic impacts since most of the construction and operation workforce is within the regional or local labor market area and construction activities are short-term. Staff has determined that there would be no significant adverse direct or cumulative socioeconomic impacts and, therefore, there are no socioeconomic environmental justice issues. The SFIA Alternative would be consistent with the applicable socioeconomic LORS.

Traffic and Transportation

The SFIA Alternative is located at the north end of San Francisco International Airport, on the North Access Road. There is a large long-term parking structure just east of the site and the area has heavy truck activity. The high level of industrial and commercial activity of the surrounding uses generates a substantial level of traffic. Similar to the proposed project, before construction could occur for the SFIA Alternative, a construction traffic control and transportation demand implementation program would need to be developed in coordination with the CCSF, City of South San Francisco, San Mateo County, and Caltrans. These programs would limit construction-period truck and commute traffic to off-peak periods and avoid potential traffic and transportation impacts.

Although the SFIA site would be less than one mile from the runways, it would be located to the north side of the east-west runway and thus would not be located on the extended runway centerline. Therefore, thermal and visible plumes from the facility would not likely cause conflicts with aircraft traffic and operations or impact aviation safety. However, a Notice to Airmen may be required advising pilots to avoid overflight of the power plant.

Because of the lack of residential traffic in the area, this site would cause fewer impacts to traffic and transportation than the proposed project.

Transmission Line Safety and Nuisance

Power generated at the SFIA Alternative would travel from the on-site switchyard to the adjacent UCI cogeneration facility, where an established corridor would be used to connect to the San Mateo-Martin corridor if the existing 115 kV option is used. Otherwise the line would travel to the East Grand Substation, 1.5 miles away. Similar to the proposed project, this alternative would not be likely to cause transmission line safety hazards or nuisances. The only difference for the impacts of concern would

depend on the actual length of the lines as potential sources of human exposure to line fields.

Visual Resources

Observation points for the SFIA Alternative include the relatively distant residential neighborhoods near the base of San Bruno Mountain, in South San Francisco. These neighborhoods are slightly over one mile distant, but they are oriented toward the general direction of the SFIA Alternative. The surroundings of this site are of an industrial nature and they include maintenance and cogeneration facilities that exhibit substantial mass. Based on previous staff assessment for this site (CEC 2002a), staff found that the power plant would introduce a low-to-moderate level of contrast because of the industrial surroundings and that the power plant would introduce a co-dominant feature to the industrial landscape. These effects would cause adverse, but not significant visual impacts that would be similar to those of the proposed project.

Waste Management

Construction at the SFIA Alternative would require excavation of fill material that underlies the site. Previous staff assessment of the adjacent properties did not identify any areas of environmental concern (CEC 2002a).

As with the proposed project, all construction and operation activities would need to be conducted in compliance with regulations pertaining to the appropriate management of wastes. Similar to the proposed project, the project would need to implement a comprehensive program to manage hazardous wastes and obtain a hazardous waste generator identification number (required by law for any generator of hazardous wastes). The environmental impact of waste disposal would be similar to the proposed project.

Water and Soils

The SFIA Alternative would be located on San Francisco International Airport property and therefore subject to the San Francisco International Airport Tenant Improvement Guide. The guide provides provisions, regulations and procedures related to erosion control and discharge. Provisions for grading operations contain Articles that state a permit must be obtained prior to the commencement of work, which may be part of the General Tenant Permit request. During construction and site preparation, if contamination is encountered, mitigation measures consisting of proper testing, treatment, and disposal would be necessary. This would likely involve participation of the San Francisco Bay Regional Water Quality Control Board and the County of San Mateo Health Department. These plans, procedures, and measures would be similar to those necessary for the proposed project.

Water for process and domestic uses would likely be obtained from the SFIA Wastewater Treatment Plant California Water Company that serves the City of South San Francisco. Wastewater would be returned to the SFIA Wastewater Treatment Plant as well.

Worker Safety and Fire Protection

The SFIA Alternative would be located within an existing industrial area on San Francisco International Airport property, served by the City of South San Francisco Fire Department. The fire risks of this alternative would be similar to those of the surrounding existing uses, including the UCI cogeneration facility, and thus would pose no new or different demands on local services.

Similar to the proposed project, it would be appropriate for the project to provide a Project Demolition and Construction Injury and Illness Prevention Program and a Project Operations Safety and Health Program in order to ensure adequate levels of industrial safety.

Engineering Assessment for SFIA Site Alternative

Facility Design

The project's facility design at the SFIA Alternative site would be similar to that of the SFERP at the proposed project site. As with the proposed project, staff-recommended measures may be appropriate to ensure compliance with engineering laws, ordinances, regulations and standards applicable to the design and construction of the project.

Geology and Paleontology

The SFIA Alternative overlies land created when the tidal flats and marshes along the margin of San Francisco Bay were reclaimed by the placement of fill. A bedrock knob is also present in the subsurface, immediately west of the SFIA site. The fill probably consists of debris and construction rubble and is believed to be underlain by variable thickness of Younger Bay Mud and Bay-Side Sand, with bedrock at relatively shallow depths along the western margin of the site. Strong seismic ground shaking (peak ground acceleration of 0.6 to 0.7g) may occur at the site in the next 50 years, although no active faults are known to cross the site. Liquefaction potential also presents an adverse site condition. Pile foundations would likely be required for the major structures of this site. Adequate design parameters for the facility would need to be determined through a site-specific evaluation by a Certified Engineering Geologist or Geotechnical Engineer.

Impacts due to seismic hazards and soil conditions would be addressed through compliance with the requirements and design standards of the California Building Code. Based on previous staff assessment for this site (CEC 2002a), impacts to geologic and paleontological resources would not be expected. Mitigation of potential impacts to paleontological resources could be accomplished with construction monitoring by a resource specialist and salvaging of any identified fossils. These impacts and the measures for mitigation would be similar to those of the proposed project.

Power Plant Efficiency

The plant configuration and combustion turbine generator technology to be employed at the SFIA Alternative would be similar to the proposed project, which means it would result in similar consumption of fuel, and it would result in a similar level of efficiency.

Power Plant Reliability

The plant configuration at the SFIA Alternative would be similar to the proposed project, which means it would result in similar levels of equipment availability. Plant maintainability, fuel and water availability, and reliability of the plant in relation to natural hazards would each be similar to the proposed project.

Transmission System Engineering

The SFIA Alternative would not satisfy the requirements of the CA ISO for allowing closure of the Hunters Point Power Plant or other in-City generation; the CA ISO requires generation to be north of Martin Substation in order to close in-City generation. Therefore, this site would not meet the stated project objectives. Locating SFERP at SFIA would also require reevaluating the capacity of the transmission system serving San Francisco. Compared to the proposed project, this alternative would be more likely to cause adverse effects to the transmission system because constraints in the San Mateo-Martin corridor and at the Martin Substation would be exacerbated.

EAST BAY ALTERNATIVE, HAYWARD

Background

This site was selected because of its proximity to an approved power plant, the Russell City Energy Center (RCEC; 01-AFC-7). Analysis of the proposed Russell City site and several alternatives was completed in the Final Staff Assessment for that project, which was published on June 10, 2002. While the exact site evaluated herein was not considered in that FSA, many characteristics of this alternative site are similar to those of the proposed RCEC site. The RCEC site is immediately south of the Hayward Water Pollution Control Facility (WPCF), and this site is immediately north of the WPCF.

The proposed RCEC site itself was not considered as an alternative site because that project was approved by the Energy Commission, and Calpine still has control of the site. Calpine has the authority to construct at that site at any time; therefore, evaluation of that same site as an alternative in this analysis was not considered an option that would necessarily add generation capacity to the region beyond that already approved.

Site Description

The East Bay Alternative is located at 3862 Depot Road (west of Cabot Boulevard) in unincorporated Alameda County immediately west of the City of Hayward. The site is near the southeastern shoreline of the Bay, west of the junction of Interstate 880 and Highway 92. The lot is level, comprises approximately 10.52 acres, and would involve the consolidation of two parcels with the same ownership. Based on the site layout presented for the proposed SFERP in the AFC, this site should be sufficient to accommodate three LM6000 gas turbines.

The site is centered between Depot Road (to the north) and Enterprise Avenue (to the south), and has approximately 150 feet of frontage along Depot Road. It is connected with Depot Road by an approximately 500-foot long driveway. The parcel is zoned industrial and is currently being used by several companies, including an auto salvage yard along Depot Road and on the southern portion there are a lumber yard, a pallets

company, and Metal Masters (owner of the site). The site is currently for sale through a local broker. The Hayward WPCF abuts the property to the south. Directly west of the parcel are salt ponds that are adjacent to the San Francisco Bay. Depot Road is a busy two-lane roadway with parking shoulders on both sides.

The site would be adjacent to an Industrial Corridor designated by the City of Hayward's General Plan that extends along the western and southwestern perimeter of the City. This area contains a diverse mix of both small and large light industrial, heavy industrial, and office uses. Although some retail commercial uses and a few residences are interspersed through the area, the vicinity of the project site is predominantly industrial in nature, characterized by manufacturing, processing, and fabricating facilities; trucking, distribution, and warehouse facilities; contractor yards and construction supply; auto wrecking and vehicle storage; and miscellaneous industrial and business park developments (CEC 2002b).

The nearest residential uses to the site consist of an apartment complex, located northeast and approximately 0.7 miles from the site, and a single-family residence on Depot Road east of Clawiter Road, also approximately 0.7 miles from the site. There are several residences remaining within the Hayward and Alameda County Industrial zones on McCone and Dunn Road (approximately 0.7 miles or more from the site) and the nearest community is confined to the Mt. Eden residential area east of Industrial Boulevard and northeast of the site (Calpine 2001).

The East Bay Alternative site is also located in the vicinity of the Hayward Regional Shoreline, which encompasses 1,682 acres along the eastern shore of San Francisco Bay consisting of salt, fresh, and brackish water marshes and seasonal wetlands. The Hayward Regional Shoreline is managed by the East Bay Regional Park District and contains a large marsh restoration project (including Cogswell Marsh and Oro Loma Marsh) and hiking and bicycling trails, including a portion of the Bay Trail. The Shoreline Interpretive Center, located on Breakwater Avenue near Highway 92 (approximately 0.9 miles southwest of the RCEC site), is managed by the Hayward Area Recreation District (HARD) and features natural history, ecology, and marine life exhibits (CEC 2002b).

Infrastructure Availability

A water pipeline would travel 0.1 miles to connect to the City of Hayward's Water Pollution Control Facility (WPCF), which is adjacent to the site to the south. Secondary treated effluent may be purchased for plant process uses. This will substantially reduce the space and capital cost required for water treatment facilities (which are included in the proposed SFERP). Minimal filtering would be required for basic process water such as cooling tower makeup. Water for injection into the turbine (NOx and Sprint systems) must be de-ionized, so this treatment step would continue to be required.

Natural gas would be supplied from a major gas local distribution line (Line 153) that parallels the Union Pacific Railroad tracks approximately 1.0 mile from the site (CEC 2002b). Gas compression would be required at the site to provide correct operating pressure for the gas turbines.

A 13.8 to 115 kilovolt (kV) step-up transformer for each unit and 115-kV on-site switchyard would be required. Approximately 1.1 miles of new 115-kV, overhead transmission line would connect the switchyard to the existing PG&E East Shore Substation via PG&E's existing East Shore to Grant 115 kV double-circuit transmission corridor, which crosses Depot Road and the Hayward WPCF approximately 600 feet east of the site. The connection would be to the East Shore Substation in a manner to be determined by PG&E.

Transmission of Electricity to San Francisco. Because the SFERP is designed to provide electricity to the CCSF, this alternative site would need additional transmission to transmit the generated electricity across the Bay and north of the Martin Substation. This would occur in a similar manner as was considered in the Russell City Energy Center FSA (CEC 2002b). The power would cross the Bay from its connection point at the East Shore Substation overhead on the existing 230 kV lines that are parallel to CA-92 (the San Mateo Bridge) approximately 12.5 miles into San Mateo Substation on the western side of the Bay in San Mateo County south of CCSF.

The addition of the SFERP generation though the East Shore Substation does not, in itself, result in a need to reconductor the East Shore to San Mateo line, because the SFERP would not trigger an overload of the line under normal conditions. Extensive transmission modeling performed for the Russell City Energy Center (RCEC) has shown, however, that this line could currently overload (pre-SFERP) under certain circumstances. Because of these potential overloads, PG&E may need to reconductor the line, changing to a higher capacity wire to prevent line failure and power outages (RCEC 2002). Should RCEC or others cause the need for reconductoring the East Shore to San Mateo line prior to this alternative coming online, there may be sufficient capacity, but only if such new generation projects and requisite upgrades preceded SFERP.

ALTERNATIVES Figure 5 shows the location of the East Bay Alternative, and **ALTERNATIVES Figure 6** shows the potential equipment layout on the site.

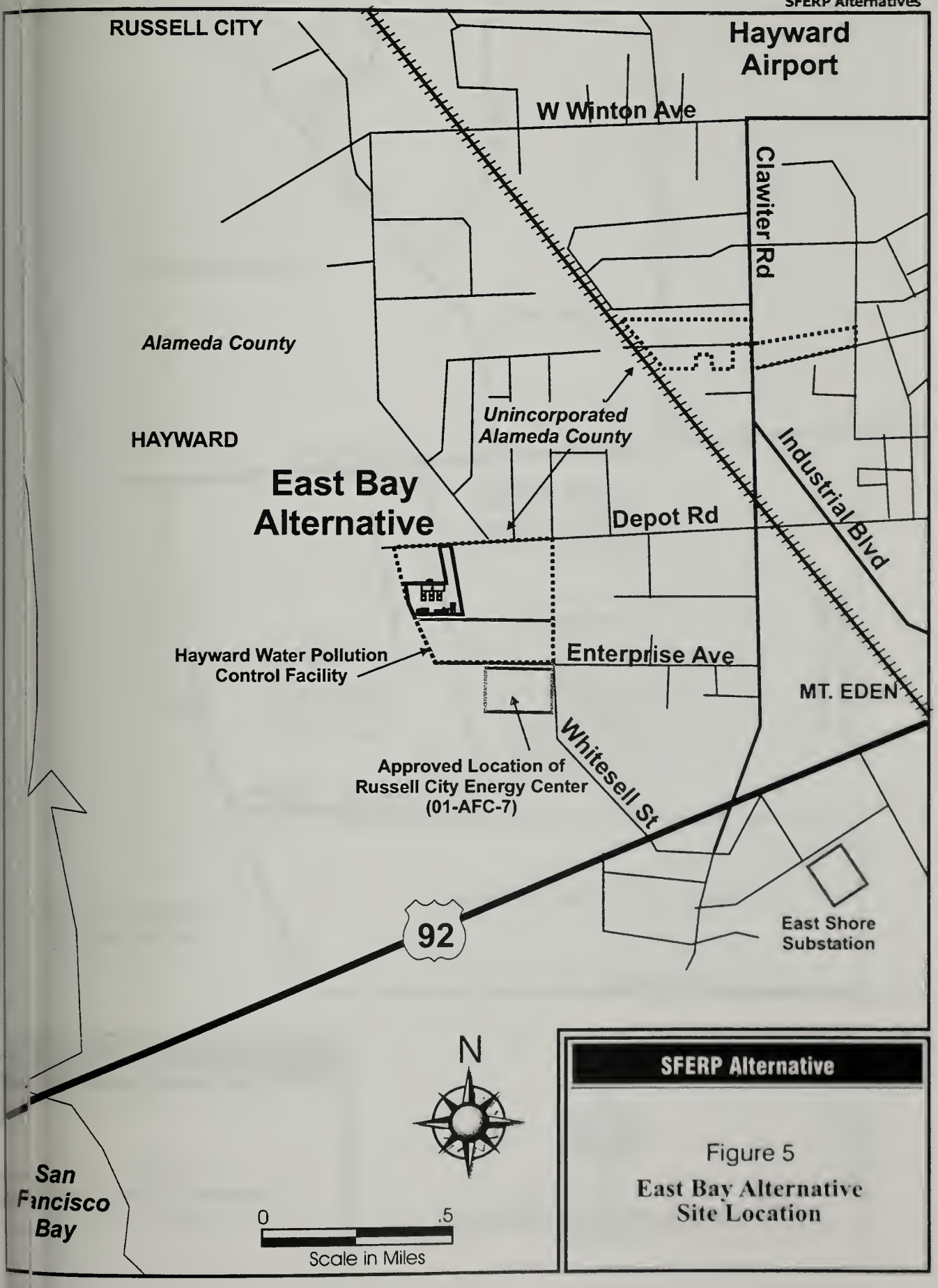
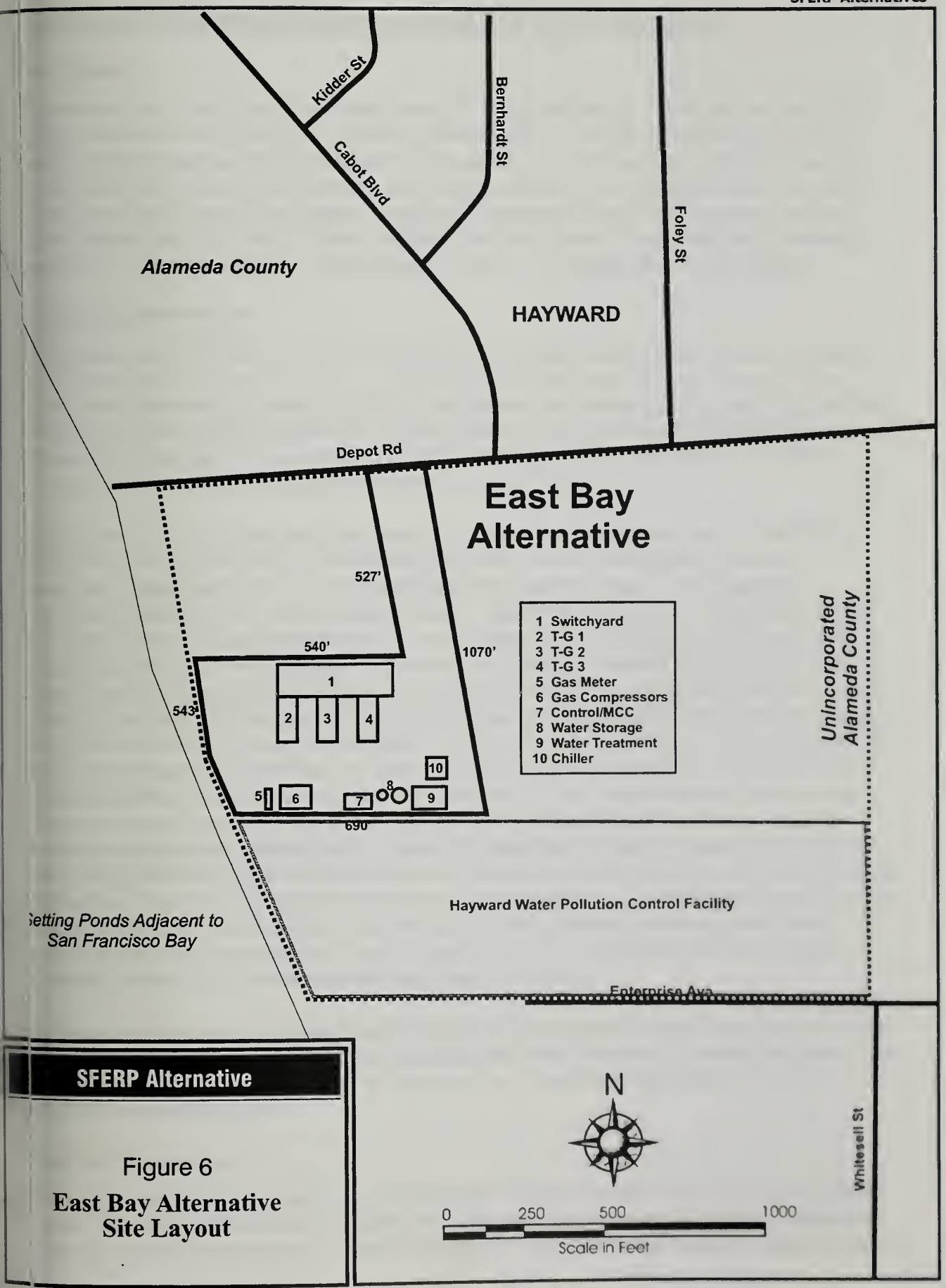


Figure 5

East Bay Alternative Site Location



SFERP Alternative

Figure 6

East Bay Alternative Site Layout

Environmental Assessment for East Bay Site Alternative

Air Quality

Emissions from this alternative would need to be controlled to satisfy the air permitting requirements of the BAAQMD. Power plant emissions, therefore, would be identical under this alternative, but in the East Bay location. As such, construction and operation of SFERP at the East Bay Alternative would be subject to permit requirements and it would require Energy Commission mitigation, similar to that of the proposed project, to avoid significant air quality impacts. Appropriate mitigation at the East Bay Alternative would likely involve similar, locally-oriented recommendations for PM10impacts.

Biological Resources

The East Bay Alternative site is a combination of storage lots, surrounded by industrial uses near the Hayward Shoreline. This site is east and north of the Hayward Area Parks and Recreation District's (HARD) salt marsh restoration project and the East Bay Regional Parks District's (EBRPD) Cogswell Marsh and Salt Marsh Harvest Mouse Preserve. The East Bay Alternative is approximately 2,000 feet from the nearest boundary of the industrial area with these protected areas.

Biological surveys of the East Bay Alternative were not conducted, but similar to the proposed project, the site is developed, and there is little likelihood of causing potentially significant impacts to terrestrial biological resources. The East Bay Alternative contains no surface water bodies. Storm water runoff management would be appropriate to avoid impacts to the nearby shoreline habitat, and because of the nearby marsh, specialized mitigation measures could be needed to minimize potential perch areas for predators (raptors, ravens and crows) of the salt marsh harvest mouse (federal and state Endangered) and ground-nesting birds such as the California clapper rail (federal and state listed Endangered). In addition, connecting this alternative to the local transmission grid will likely require the installation of bird flight diverters on the above-ground ground wire to lessen the likelihood of bird collisions with these small diameter wires located above the conductors. If the East Bay Alternative requires transmission line reconductoring to lessen the likelihood of transmission line overloads, then additional biological resource impacts may occur along the shoreline, and possibly in the Bay, if existing towers and conductors need replacing. If the project were located at this alternative site, the plant's air emissions would create concerns about the potential for NOx emissions to affect biological resources near the site, i.e., at the Cogswell Marsh and Salt Marsh Harvest Mouse Preserve.

Because of the proximity of the East Bay Alternative to the protected salt marsh habitat preserves and associated protected species, the overall impacts to biological resources at this alternative site would likely be greater than those that would occur with the SFERP proposed project.

Cultural Resources

Records searches and detailed site surveys for cultural resources were not completed for the East Bay Alternative, but during a pedestrian field survey, no historic structures were apparent on the parcel. Adjacent buildings, structures and linear facilities were not

evaluated to determine if they meet the eligibility requirements for the CRHR. Buried archaeological and prehistoric cultural resources may be present at the site and in the vicinity of linear facilities. Compared to the SFERP site, developing SFERP at the East Bay Alternative would be slightly less likely to have an impact on cultural resources because the site is located farther inland from the bayshore.

To avoid impacts potentially caused by disturbing buried cultural and historic resources at the East Bay Alternative, mitigation requiring oversight of a cultural resources specialist would likely be necessary; however these potential impacts would be similar to those associated with the proposed project site.

Hazardous Materials Management

Hazardous materials use, including the quantities handled during transportation and disposal, would be identical to the proposed project. The transportation route to the East Bay Alternative would occur from State Route 92, over Clawiter Road, and Depot Road, and it would generally avoid residential areas. Compared to operation of the proposed project at the SFERP site, impacts from transportation of hazardous materials would be similar because of the lack of proximity to homes. No special measures related to hazardous materials management would be required for this alternative site, and impacts during operation would be similar.

Land Use

The City of Hayward General Plan designates the East Bay Alternative with industrial zoning. The site is near but not within areas covered by the Hayward Area Shoreline Planning Agency (HASPA) and the San Francisco Bay Conservation and Development Commission (BCDC) San Francisco Bay Plan. Similar to the SFERP site, the uses surrounding the East Bay Alternative are primarily industrial, and use of the East Bay Alternative would not be likely to conflict with any applicable land use plan, policy, or regulation.

Noise

The residences nearest to the East Bay Alternative are 0.7 miles to the east on the western edge of the Mt. Eden residential area (near Depot Road and Industrial Boulevard). There are single family and multi-family homes in this area, presently exposed to a significant level of traffic noise on Depot Road and Industrial Boulevard. Compliance with the Hayward Noise Element would be likely at the nearest residential areas because of their sufficient distance from this alternative site. Compared to the proposed project, this alternative would cause similar operational noise impacts, and economical means of mitigating noise emissions to a level of insignificance would likely be available. Construction noise would cause impacts similar to those expected at the SFERP site.

Public Health

The air pollutants emitted by the SFERP at the East Bay Alternative would be identical to those that would occur at the proposed project site. As such, the project's emissions of toxic air contaminants would not be likely to expose the surrounding population to an significant risk of cancer or non-cancer health effects.

Socioeconomics

Staff has estimated the benefits from the SFERP project should it be built at the East Bay alternate site. Benefits include increases in sales taxes, employment, and income for Alameda and neighboring counties (see **SOCIOECONOMICS Table 2** for data and information). Staff finds that the SFERP project will not cause a significant adverse socioeconomic impact on the study area's housing, schools, police, emergency services, hospitals, and utilities. Based on staff's demographic screening analysis, the minority population within six miles of the East Bay Alternative site is about 65 percent and it is approximately 75 percent within a one mile radius of the Russell City Energy Center site, which is less than one mile to the south. The low-income population within six miles is about 8.5 percent. In comparison, based on staff's demographic screening analysis for the proposed SFERP project, the minority population within six miles of the proposed power plant site at Potrero is less than 57 percent and the low-income population within six miles is slightly above 11 percent.

Staff finds that there would be no adverse socioeconomic impacts since most of the construction and operation workforce is within the regional or local labor market area and construction activities are short-term. Staff has determined that there would be no significant adverse direct or cumulative socioeconomic impacts and, therefore, there are no socioeconomic environmental justice issues. The East Bay Alternative would be consistent with the applicable socioeconomic LORS.

Traffic and Transportation

Traffic in the vicinity of the East Bay Alternative tends to be congested due to the high level of industrial activity of the surrounding uses. Similar to the proposed project, before construction could occur at the East Bay Alternative, a construction traffic control and transportation demand implementation program would need to be developed in coordination with the City of Hayward and Caltrans to limit construction-period truck and commute traffic to off-peak periods and avoid potential traffic and transportation impacts.

The East Bay Alternative would be sufficiently distant from the Hayward Municipal Airport (1.3 miles northeast of the site) so that it would not adversely affect air traffic.

Transmission Line Safety and Nuisance

The electricity from the SFERP at the East Bay Alternative would travel through a new 115 kV overhead transmission line, parallel to an existing 115 kV line for approximately 1.5 miles to the East Shore Substation. The substation would need to be modified within its fence line to accommodate its entry. Approximately 600 feet of the new transmission line would occur in a new right-of-way until it intersects with the existing East Shore-Grant corridor.

Because substantial system reinforcements may be necessary, especially to the cross-bay corridor, the transmission line safety and nuisance impacts would likely be greater than those that would occur under the proposed project. This, and the much longer line needed for this alternative site would make it less preferable than the proposed Potrero

site in terms of the total length of the source of line fields to which individuals might be exposed.

Visual Resources

Relevant key observation points from residences and a recreational area (Hayward Shoreline Interpretive Center within the Hayward Shoreline Recreational Park) would be located more than 0.7 miles from the East Bay Alternative.

The most prominent project feature at this distance would be the three 85-foot tall stacks. The stacks would be substantially taller than the surrounding industrial structures, which tend to be less than 40 feet tall. With the exception of the stacks, the horizontal form and straight lines of other project features would appear similar to the form of existing structures. The medium gray color of the project would contrast moderately with the white color of existing structures which themselves contrast highly with landforms. The project would appear co-dominant with existing structures.

The project would occupy a small portion of the wide field of view available at the Hayward Shore Interpretive Center. The spatial prominence of the project would be reduced since it would be seen entirely against the backdrop of the East Bay Hills (i.e., project structures would not extend above the ridgeline of the hills).

The project would block from view a relatively small amount of an undeveloped portion of the East Bay Hills for Interpretive Center trail users. In addition, this view blockage would be of short duration as a trail user's position relative to the project site changes.

The project would have moderately low contrast with the rolling, horizontal form of the East Bay Hills. The gray colors of the project would cause moderately low contrast with the seasonal brown and green color of the landforms. Scale contrast would be low since the project would appear much smaller than the landforms.

Similar to the proposed project, mitigation would be appropriate for minimizing the visual effects and light and glare.

The SFERP does not propose landscaping. However, the layout of the project on the East Bay Alternative site and the design of project landscaping in areas along the perimeter of the site that front on streets would require standard street trees be planted to comply with the requirements of the City of Hayward's zoning ordinance, and to provide for a continuation of the Industrial Corridor's tree canopy. The canopy created by the street trees would block views toward stacks and other tall features from nearby areas and would integrate the project into the overall visual composition of the area. Setback areas would need to be established and be landscaped with a mixture of trees, shrubs, and groundcovers to create a visually engaging composition in views from existing roads.

With the project's architectural treatment and careful landscaping around the perimeter of the site to provide maximum screening of views toward the site, the project would visually relate to its immediate setting. The project at the East Bay Alternative site would

cause adverse but not significant visual impacts that would be similar to those of the proposed project.

Waste Management

Construction at the East Bay site would require removal of automobiles from the salvage yards, and oversight of this activity may be necessary to ensure proper removal and disposal. This activity and other construction and operation activities would need to be conducted in compliance with regulations pertaining to the appropriate management of wastes. Similar to the proposed project, the project would need to implement a comprehensive program to manage hazardous wastes and obtain a hazardous waste generator identification number (required by law for any generator of hazardous wastes). The environmental impact of waste disposal would be similar to the proposed project.

Water and Soils

Contaminated soils or groundwater could be encountered at the East Bay Alternative because of previous activities that may have resulted in hydrocarbon spills. Site assessment and remediation may be necessary prior to construction, which would involve participation of the San Francisco Bay Regional Water Quality Control Board, and possibly the City of Hayward Fire Department. During construction and site preparation, if contamination is encountered, mitigation measures consisting of proper testing, treatment, and disposal would be necessary.

Plans for grading and erosion control, dewatering, and storm water pollution prevention would also need to be reviewed by local agencies, including the San Francisco Bay Regional Water Quality Control Board, the City of Hayward Public Works Department, Alameda County Public Works Agency, and the State Water Resources Control Board. These plans, procedures, and measures would be similar to those necessary for development of SFERP at the proposed project site.

Worker Safety and Fire Protection

The East Bay Alternative would be located within an existing industrial area that is currently served by the local fire department. The fire risks of this alternative would be similar to those of the surrounding existing uses, including the Hayward WPCF, and thus would pose no new or different demands on local services.

Similar to the proposed project, it would be appropriate for the project to provide a Project Demolition and Construction Injury and Illness Prevention Program and a Project Operations Safety and Health Program in order to ensure adequate levels of industrial safety.

A previous staff assessment for another power plant evaluated the availability of fire and EMS equipment, staff, and response time and found them to be adequate (CEC 2002b).

Engineering Assessment for East Bay Site Alternative

Facility Design

The project's facility design at the East Bay Alternative site would be similar to that of the SFERP at the proposed project site. As with the proposed project, staff-recommended measures may be appropriate to ensure compliance with engineering

laws, ordinances, regulations and standards applicable to the design and construction of the project.

Geology and Paleontology

Strong seismic ground shaking is probable at the site, and this may be amplified by young Bay mud and unconsolidated sediments underlying the site. The site may also be subject to expansive soil conditions (i.e., soils that swell when saturated). Adequate design parameters for the facility would need to be determined through a site specific evaluation by a Certified Engineering Geologist or Geotechnical Engineer.

Impacts due to seismic hazards and soil conditions would need to be mitigated by complying with the requirements and design standards of the California Building Code and standards adopted by the City of Hayward Public Works Department. Based on the assessment for the nearby (proposed) Russell City Energy Center, impacts to geologic resources would not be expected. Mitigation of potential impacts to paleontological resources could be accomplished with construction monitoring by a paleontological resources specialist and salvaging of any identified fossils. These impacts and the measures for mitigation would be similar to those of the proposed project.

Power Plant Efficiency

The plant configuration and combustion turbine generator technology to be employed at the East Bay Alternative would be similar to the proposed project, which means it would result in similar consumption of fuel, and it would result in a similar level of efficiency.

Power Plant Reliability

The plant configuration at the East Bay Alternative would be similar to the proposed project, which means it would result in similar levels of equipment availability. Plant maintainability, fuel and water availability, and reliability of the plant in relation to natural hazards would each be similar to the proposed project.

Transmission System Engineering

The East Bay Alternative would not satisfy one of the CA ISO's requirements for a generator that would allow closure of in-City generation, including the Hunters Point Power Plant and Potrero Unit 3: locating a generator on the San Francisco Peninsula, north of the Martin Substation, which is also a stated project objective. Locating SFERP in the East Bay would also require reevaluation of the capability of the transmission system, especially the existing cross-bay connections that would bring the power generated to CCSF. In addition, based on the staff assessment for the proposed RCEC, there is a possibility that use of the East Bay Alternative for SFERP would overload portions of the transmission system (CEC 2002b). Higher capacity conductors between the East Shore and San Mateo Substations may be required to ensure full output of the SFERP at this site, and modifications to the East Shore Substation would also be required. Similar modifications to the transmission system may be necessary to ensure full output of SFERP if RCEC were constructed first. Additional transmission constraints may also be encountered between the San Mateo Substation and San Francisco.

POTRERO POWER PLANT UNIT 7

Alternative Description

Mirant Potrero, LLC (Mirant) filed its original Application for Certification (AFC) on May 31, 2000, for the Potrero Power Plant Unit 7 Project, which would be a nominal 540 MW natural gas-fired, combined cycle power generating facility. Mirant proposed to construct and operate the plant as an expansion of its existing Potrero Power Plant (Units 3 through 6) that is located on the eastern edge of the CCSF. This site was originally considered for the proposed SFERP; however, the City was unable to conclude an option agreement with Mirant for the purchase of the site. Therefore, the location of the proposed SFERP was changed and the Potrero Power Plant site was instead considered as an alternative (the Mirant Site) in the Supplemental Application for Certification (SFPUC 2005a).

The existing Potrero Power Plant, located on 26 acres approximately 0.5 miles north of the proposed SFERP and adjacent to Potrero Substation, is one of two power plants in California that are required to maintain dual-fueled capabilities (natural gas and fuel oil) by the CA ISO. Major existing site features include:

- Unit 3, a 206-MW, steam turbine generator that has dual-fuel capabilities, natural gas and Bunker C fuel oil. Its normal, and current, mode of operation is natural gas firing. Conversion of Unit 3 to use Bunker C should it be required due to partial or full loss of other generation and/or transmission sources, would take approximately 10 days. Unit 3 features a once-through power plant cooling system comprised of intake/outfall structures (CEC 2002a). These structures would be replaced by new intake/discharge systems as a part of the Unit 7 project.
- Three distillate-fired 52-MW peaking units, Units 4, 5 and 6 (totaling 156-MW).
- Three fuel tanks. Tanks Numbers 3 and 4 are filled with Bunker C fuel oil for emergency operation of Unit 3 should natural gas service be interrupted. Tank Number 5 holds the distillate fuel for the peaking Units 4, 5 and 6.
- Station A Complex: turbine room, pump house and gatehouse.
- Gas plant structures: Meter House and Compressor House.

The Unit 7 plant would be located in west-center portion of the site where the existing turbine building stands. Unit 7 would feature two Combustion Turbine Generators (CTGs) and one Steam Turbine Generator (STG). Heat generated from each CTG (a combustion cycle) would flow through a separate Heat Recovery Steam Generator (HRSG) where steam would be produced, which would be used to drive the STG (a steam cycle). This two CTG/HRSG and one STG set up is referred to as a "two-on-one" combined-cycle configuration. Pollution controls on each CTG/HRSG "train" would include a Selective Catalytic Reduction (SCR) system to control the emissions of oxides of nitrogen (NOx), and a CO catalyst to control carbon monoxide emissions. Aqueous ammonia would be used as the reagent in Unit 7's SCR system. Deliveries will be made by tanker trucks and stored in two new and identical, 20,000-gallon aboveground storage tanks. One tank would be used for Unit 7; with the second tank provided for the Unit 3 SCR retrofit, which is required for compliance with Bay Area Air Quality Management District regulations.

In the January 19 and 31, 2001, amendments to the AFC, Mirant added the demolition of six existing structures to the project. The Station A Complex (turbine room, office, pump house and gate house) and the Meter House and Compressor House were originally slated to be removed under permits issued by the CCSF, but due to urgings by the CCSF and delays, demolition was included in the Energy Commission's Staff Assessment process.

In its original application, Mirant proposed to use water from San Francisco Bay for circulating cooling purposes at the rate of 158,000 gallons per minute (228 million gallons per day). Energy Commission staff in its Final Staff Assessment (FSA) for the project (February 11, 2002) recommended that the project be licensed with mitigation, including replacement of the proposed once-through cooling system with an alternative cooling system. Two cooling options were recommended by Energy Commission staff: a hybrid cooling system that would use reclaimed water and cooling towers, or a dry cooling system that could cool power plant exhaust without use of substantial quantities of water. The FSA identified significant impacts that would result if Mirant implemented its proposed once-through cooling system. In response, in mid-2003, Mirant filed an AFC amendment that analyzed the use of recycled-water cooling systems and proposed use of hybrid cooling, eliminating the previously proposed once-through cooling system.

Mirant requested certification of the project with both cooling system alternatives. Because the original proposal to use a once-through power plant cooling system was not supported by staff in the February 11, 2002, FSA, this staff assessment considers only the hybrid (wet/dry) option to be feasible. The hybrid cooling option would use recycled water from the SEWPCP within a wet/dry plume abated cooling tower at the Unit 7 site. It would require construction of new pump stations and pipelines between the Potrero site and the SEWPCP to convey secondary effluent water from the SEWPCP and return blowdown and sludge water from the Unit 7 power plant. This would avoid potentially significant impacts to aquatic biological resources that were identified for the once-through cooling option.

Mirant Corporation filed for bankruptcy protection on July 14, 2003, and in early November 2003, it requested that review of the AFC be suspended. A year suspension to November 15, 2004 was granted by the Committee and a second request was granted extending the current suspension for another year to November 15, 2005. The suspension order requires that Mirant provide a 45-day notice of their intent to reactivate the proceedings.

It is not certain that the Potrero Unit 7 project could be permitted with either the once-through or hybrid cooling systems. Even if the effects on aquatic resources were eliminated, there was substantial public concern about the effect of Potrero Unit 7 on public health and safety, as well as environmental justice issues due to effects of the proposed plant on areas with disproportionately high minority and low-income populations. The CCSF would have to approve the Potrero Unit 7 project because either cooling option would require a permit from the City (or its Port Authority).

Despite the CCSF's stated opposition to the Potrero Unit 7 project, it is being considered as an alternative to the SFERP, because Mirant could continue with its

application process and construction of the Potrero Unit 7 Project. The Energy Commission believes that it is important that a comparison of the potential impacts of Potrero Unit 7 Project with the impacts of the SFERP be presented for review by the public and affected agencies.

Infrastructure Availability

The natural gas pipeline currently serving Potrero Units 3 through 6 would fuel the proposed Unit 7. A pipe tie-in would be made to the gas distribution line and this service will be connected to a compressor station that would be part of Unit 7.

Interconnection with the State's high voltage transmission system would be through the new Potrero Power Plant Switchyard, located onsite, and to two existing PG&E substations. These would be a direct interconnection to PG&E's Potrero Substation adjacent to the Potrero Power Plant, and a separate underground interconnection to the Hunters Point Substation located approximately 1.8 miles to the south of the Potrero Power Plant site. This interconnection was originally part of the Potrero Power Plant Unit 7 AFC, but it is currently being evaluated by the CPUC in response to an application from PG&E to construct the underground 115 kV transmission line, and would not be part of the Potrero Unit 7 project if it were reconsidered.

ALTERNATIVES Figure 1 shows the location of the Potrero Power Plant.

Environmental Assessment for Potrero Unit 7 Alternative

Air Quality

The range of air pollutants emitted by the Potrero Power Plant Unit 7 alternative would be similar to those that would occur with proposed project because both would fire large quantities of natural gas. All emissions from the Potrero Power Plant Unit 7 alternative would need to be controlled to satisfy the air permitting requirements of the BAAQMD. As such, construction and operation of Unit 7 would be subject to BAAQMD requirements set forth in the Energy Commission permit. The Unit 7 alternative would provide a more efficient level of electrical output per pound of pollution generated. Compared to the SFERP, which would create 0.09 pounds of NOx per megawatt-hour (lb/MW-hr) (SFERP 2004a), the Unit 7 alternative would emit NOx at a rate of approximately 0.07 lb/MW-hr. The following table (**ALTERNATIVES: Table 3**) shows the criteria pollutant emissions during routine operation of the 540 MW Unit 7 alternative compared with operation of the proposed 145 MW SFERP.

ALTERNATIVES Table 3
Comparison of Maximum Hourly and Annual Emissions

	NOx		PM10		CO		SOx		VOC	
Equipment/Sources	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Unit 7 Alternative Total	40	138	26	96	60	206	6	20	11	38
SFERP Total	13	40	9	18	13	28	1	3	4	8

Sources: Potrero Unit 7 AFC Cooling Tower System Amendment Table 8.1-6 (steady state with duct burners, including cooling tower emissions; annual basis: 7,446 hours per year); SFERP AFC Table 8.1-17 (steady state; annual basis: approximately 4,000 hours per year).

Air quality impacts from the Potrero Power Plant Unit 7 alternative would be greater than those under the proposed project, and they would require additional mitigation for localized PM10impacts. Mitigation required for the Potrero Power Plant Unit 7 alternative would likely be similar in nature to that necessary for SFERP, but it would need to be in substantially greater quantities.

Biological Resources - Aquatic

The Potrero Power Plant Unit 7 alternative with once-through cooling would cause significant impacts to aquatic biological resources. To address this, staff previously recommended alternative technologies for cooling as a means of avoiding significant impacts related to the loss of planktonic organisms from once-through cooling. Impacts to aquatic biology would much more severe with the Unit 7 alternative with once-through cooling when compared to the proposed project.

The hybrid (wet/dry) cooling system option, proposed by Mirant in July 2003 (Potrero Power Plant Unit 7 AFC Cooling Tower Amendment), would avoid nearly all impacts to aquatic biological resources impacts. With the hybrid cooling option, the Potrero Power Plant Unit 7 alternative would not be expected to cause significant impacts to aquatic biological resources because all blowdown and sludge water from the cooling system would be returned to the SEWPCP for treatment. With this cooling system, the impacts of the Potrero Power Plant Unit 7 alternative would be similar to those of the proposed project.

Biological Resources - Terrestrial

The Potrero Power Plant Unit 7 alternative would require temporary use of temporary laydown facilities either at Pier 80 or Pier 96. This would involve a large area of construction activity, but it would occur on urban and disturbed lands, where no potentially significant impacts to terrestrial biological resources would be expected. Although more land would be disturbed with this alternative, potential impacts to terrestrial biology during construction would be similar to those of the proposed project. If the project were located at this alternative site, it would have similar NOx emission concerns for biological resources as the proposed project site. Storm water runoff management would be essential to avoid impacts to the surface waters.

During operation of the Potrero Power Plant Unit 7 alternative, bird collisions with the exhaust stacks may occur, but as with the proposed project, these impacts would not be considered significant.

Cultural Resources

The Potrero Power Plant Unit 7 alternative would require mitigation to avoid potentially significant impacts related to disturbing buried archaeological resources. At the time of the Energy Commission's analysis, potentially significant impacts were identified due to the possible demolition of the historic Meter House and Compressor House at the site. Staff previously recommended relocating them elsewhere in San Francisco for preservation (CEC 2002a). During hearings on the Potrero Unit 7 case, staff determined that no feasible locations were available for the Meter House and the Compressor House. Since the structures could not be moved, the demolition of the

Compressor House and the Meter House were found to result in an unmitigable significant impact. The demolition of both the Meter House and the Compressor House would be much more severe impacts than historic resource impacts under the SFERP project. However, on May 4, 2005 the San Francisco Planning Department issued a Notification of Project Receiving Environmental Review stating that the City will be performing an environmental review on the demolition of the Station A buildings at Potrero Power Plant due to seismic risks. This proposed demolition would include the Station A Turbine, Compressor House, Meter House, and Gate House Buildings. If this demolition were to occur, this impact would not be attributed to the Potrero Unit 7 project and cultural resources impacts between the two sites would be similar.

Hazardous Materials Management

Construction of the Potrero Power Plant Unit 7 alternative would require use of small quantities of hazardous materials, such as lubricating oils and fuels. Operation of the combined-cycle power plant would similarly involve some use of oils and fuels, and it would also require transportation, handling and use of hazardous materials in large quantities. For air pollution control systems, substantial quantities of aqueous ammonia would need to be delivered to the site and stored. There would be a risk of impacts if a catastrophic accidental release of ammonia occurred, but staff previously assessed such a scenario and found that significant concentrations would not result off-site (CEC 2002a). Large quantities of other materials would also be used, such as sulfuric acid, sodium hypochlorite, and petroleum fuels.

These materials would be present at the site in quantities greater than those under the proposed project. Because of the large quantities, a Risk Management Plan and Safety Management Plan would be required for ensuring safe management of these materials, as it would be for the proposed SFERP project. The U.S. EPA and CCSF would be required to review and oversee implementation of the management plans, in conjunction with Energy Commission staff. Compared to the proposed project, impacts from transportation of the larger quantities of hazardous materials would be increased under the Unit 7 alternative but would remain an insignificant risk.

Land Use

The City and County of San Francisco's Central Waterfront Area Plan designates the Potrero Unit 7 site with zoning for heavy industry. The site is adjacent but not within properties covered by the plans of the Port of San Francisco. The BCDC's San Francisco Bay Plan would only apply to portions of the Potrero Power Plant Unit 7 alternative associated with the proposed once-through cooling system. With the hybrid cooling option, no portion of the Potrero Power Plant Unit 7 alternative would be within the jurisdiction of the BCDC. Measures that would be appropriate under the proposed project, to facilitate access to the shoreline and the San Francisco Bay Trail, consistent with BCDC and local recommendations, would also be applicable to this alternative. As with the proposed project, the Potrero Power Plant Unit 7 alternative would not be likely to conflict with any applicable land use plan, policy, or regulation.

Infrastructure necessary for the Potrero Power Plant Unit 7 alternative may include underground pipelines connecting to the SEWPCP for reclaimed water. Such off-site improvements would need to be coordinated with other ongoing projects in the vicinity,

such as the Municipal Railway Metro East Light Rail Maintenance and Operations Facility and the Third Street Light Rail Transit Line. Compared to the proposed SFERP, construction of this off-site infrastructure would require more rigorous coordination with loca agencies.

Noise

The nearest residentially-zoned residence with a direct line of site to the Potrero Power Plant Unit 7 alternative would be approximately 1,200 feet from the facility. This location is presently exposed to a significant level of traffic noise from surrounding surface streets. Compliance with the CCSF Zoning Code would be likely at the nearest existing residences, including newer live/work projects near the site, primarily because of their industrial zoning. The Potrero Power Plant Unit 7 alternative may, however, cause a significant noise increase at an adjacent live/work property if the hybrid cooling option is selected, because the wet/dry cooling tower would include numerous large diameter fans, which may warrant a special noise-reducing design.

Potentially significant noise from power plant components can typically be reduced with economical design modifications. Mitigation measures to minimize the noise increases with the Potrero Power Plant Unit 7 alternative would be similar to those recommended for the proposed SFERP. Although staff has not completed a detailed assessment of the Potrero Power Plant Unit 7 alternative with the hybrid cooling option, low-speed fans could be employed in the wet/dry cooling tower if they would be necessary to avoid a significant noise increase. Construction noise would cause impacts slightly greater than those anticipated for SFERP because they would occur over a longer duration. Althougl noise impacts would be slightly greater than with the proposed project, measures would be available to mitigate all potentially significant impacts.

Public Health

The range of air pollutants emitted by the Potrero Power Plant Unit 7 alternative would be similar to those that would occur with proposed project because both would fire large quantities of natural gas. The toxic contaminant that would be emitted in the greatest quantities by the 540 MW Potrero Power Plant Unit 7 alternative would be ammonia, which could be emitted by the facility at a maximum rate of approximately 60 pounds per hour (SECAL 2000). This can be compared to the 145 MW SFERP, which could emit ammonia at a maximum rate of 19.6 lb/hr (SECAL 2000). The Unit 7 alternative would emit greater quantities of toxic air contaminants. However, similar to the proposed project, this alternative would not be likely to expose the surrounding population to any significant risk of cancer or non-cancer health effects.

Socioeconomics

Staff has estimated the benefits from the SFERP project should it be built at the Potrero Power Plant Unit 7 site. Benefits include increases in sales taxes, employment, and income for San Francisco and neighboring counties (see **SOCIOECONOMICS Table 2** for data and information). Staff finds that the SFERP project will not cause a significant adverse socioeconomic impact on the study area's housing, schools, police, emergency services, hospitals, and utilities. Based on staff's demographic screening analysis, the minority population within six miles of the Potrero Power Plant Unit 7 site (where both the SFERP and the Potrero Unit 7 alternative would be located) is about 57 percent

(within one mile the minority population is 51 percent), though there are individual census blocks with greater than 75 percent minority population. The low-income population within six miles is approximately 11 percent.

Staff finds that there would be no adverse socioeconomic impacts since most of the construction and operation workforce is within the regional or local labor market area and construction activities are short-term. Staff has determined that there would be no significant adverse direct or cumulative socioeconomic impacts and, therefore, there are no socioeconomic environmental justice issues. As was determined in the Staff Assessment for the Potrero Power Plant Unit 7, the Potrero Power Plant Unit 7 alternative would be consistent with the applicable socioeconomic LORS (CEC 2002a).

Traffic and Transportation

The high level of industrial activity of the surrounding uses generates a substantial level of truck traffic. Similar to the proposed project, before construction could occur for the Potrero Power Plant Unit 7 alternative, a construction traffic control and transportation demand implementation program would need to be developed in coordination with the CCSF and Caltrans. These programs would limit construction-period truck and commute traffic to off-peak periods and avoid potential traffic and transportation impacts.

The Potrero Power Plant Unit 7 alternative would have the potential to cause a greater disruption of local streets due to its longer construction schedule and off-site infrastructure that would be necessary. While the proposed project would require approximately 0.75 miles of construction in city streets to install the process water supply pipeline, the Potrero Power Plant Unit 7 alternative may require additional pipelines to the SEWPCP if the hybrid cooling option is included. Although these impacts would be more severe than those of the proposed project, they would be less than significant through proper coordination with local agencies.

Transmission Line Safety and Nuisance

The electricity from the Potrero Power Plant Unit 7 alternative would travel through two paths: an interconnection to the existing Potrero Substation, and an underground 115 kV transmission line for approximately 1.8 miles in city streets to the Hunters Point Substation. Compared to the proposed project, which would only connect to the adjacent Potrero Substation, this alternative would be more likely to cause transmission line safety hazards or nuisances.

Visual Resources

The Potrero Power Plant Unit 7 alternative would occur less than 0.5 miles from the site of the proposed project, within the highly urbanized western shore of the San Francisco Bay. The same visual setting and key observation points (KOP) that apply to the SFERP would also apply to this alternative.

The most visible features of the Potrero Power Plant Unit 7 alternative would include two 60-foot tall air inlets to the combustion turbine generators, the 60-foot tall steam turbine generator, the 94-foot tall heat recovery steam generator trains, and two 180-foot tall stacks. If the hybrid cooling option is selected, the wet/dry cooling tower

would also be a prominent structure at 70 feet high, with a footprint of 670 feet by 60 feet. The cooling tower would also generate steam plumes, especially during cool and wet weather, although the hybrid design would substantially abate the frequency of visible plumes. Other features of the Potrero Power Plant Unit 7 alternative would include an expansion to the Potrero Substation switchyard and possibly the once-through cooling water intake structure, adjacent to the shoreline. The existing 300-foot stack that dominates most views of the area would remain in place under this alternative.

Numerous residences at elevated locations on Potrero Hill would have a view of the site. While residents generally anticipate open, frontal views of a highly urbanized, industrial waterfront landscape, any new industrial features in the views of the Bay would be perceived as detracting from the more scenic elements of the view.

Relevant observation points, including existing residences and recreational areas, would be located approximately 0.5 miles away from the site, which puts the site between the foreground and middle-ground viewing distances for viewers. The Potrero Power Plant Unit 7 alternative would introduce prominent structures of industrial character into the foreground to middle-ground of views from nearby residences and recreation areas. The existing landscape is industrial in appearance with forms, lines, and characteristics similar to those of this alternative. Given this setting and the distances to observation points, the Potrero Power Plant Unit 7 alternative would be co-dominant with existing structures, and would have a low to moderate degree of visual contrast depending on viewpoint. In the context of the site's overall moderate visual impact susceptibility, the resulting visual impact would be considered adverse but not significant. Similar to the proposed project, mitigation would be appropriate for minimizing the visual effects and light and glare.

Similar to the proposed project, it would be difficult for the Potrero Unit 7 alternative to incorporate power plant structure design that would enhance the pleasure of the user o viewer of the Bay or preserve views of the Bay and shoreline, and to ensure that public access is consistent with the BCDC Public Access Design Guidelines. Presently, the only view of the Bay from Illinois Street in the project vicinity is looking down 23rd Street. This alternative may require architectural screening of the project's HRSG and the exhaust stacks; similar to the red brick building façade proposed for the original Potrero Unit 7 project. The SFERP does not propose landscape screening because it involves smaller and less bulky structures than the Unit 7 project and is outside of the jurisdictional boundary of the BCDC. The SFERP is also located farther from residences.

The Unit 7 alternative would increase the structural density and limit visual access across the site and views of the Bay. Under the present circumstances, views from Illinois Street across the undeveloped site of the future light rail maintenance and operation facility to this alternative site are unobstructed.

Waste Management

Hazardous and non-hazardous wastes would be generated during construction and operation. Construction wastes would be generated, similar to that of the proposed

project, but in larger quantities due to the longer and more intense construction schedule. There would also be an increased likelihood of encountering unknown contamination during off-site construction excavations that would be required under this alternative (including the transmission cable and possibly pipelines); however, managing such wastes would require oversight by the San Francisco Department of Public Health, the San Francisco Bay Regional Water Quality Control Board, and the Department of Toxic Substances Control. If the once-through cooling option is selected for the Potrero Power Plant Unit 7 alternative, contaminated off-shore sediment could be disturbed during construction of the cooling water intake structure. Dredged material would need to be transferred to land and disposed at an appropriate facility. The environmental impact of dredged material disposal would be greater than the impacts associated with the proposed project.

All construction and operation activities would need to be conducted in compliance with regulations pertaining to the management of hazardous wastes. As with the proposed project, it would be appropriate for the project to implement a comprehensive program to manage hazardous wastes and obtain a hazardous waste generator identification number (required by law for any generator of hazardous wastes).

Water and Soils

Contaminated soils or groundwater could be encountered under this alternative because of the excavations that would be necessary to install off-site underground infrastructure (including possible pipelines for the hybrid cooling option). Although there would be an increased likelihood of encountering unknown contamination, site assessment and remediation would involve participation of oversight agencies so that potential impacts to water and soil resources from contamination would be similar to those of the proposed project.

Plans for grading and erosion control, dewatering, and storm water pollution prevention would also need to be reviewed by local agencies, including the San Francisco Bay Regional Water Quality Control Board, the San Francisco Public Utilities Commission Bureau of Environmental Regulation and Management, and the State Water Resources Control Board. These plans, procedures, and measures would be similar to those necessary for development of SFERP.

The Potrero Power Plant Unit 7 alternative could substantially affect surface water quality if the once-through cooling option is selected. Approximately 158,000 gallons per minute of seawater would be circulated for the heat rejection cycle under this option. This would cause a discharge of a thermal plume and biological waste to the San Francisco Bay. Cooling water intake structures and thermal discharges are regulated through Section 316 of the Clean Water Act, which requires minimizing the environmental effects caused by the new structures and the associated thermal discharges. The U.S. EPA defines the standards for intake structures and would ensure that the best technology available (BTA) is used. The State Water Resources Control Board also manages the adverse effects of thermal waste through the California Thermal Plan.[3] The U.S. Army Corp of Engineers, the San Francisco Bay Regional Water Quality

[3] The official name of the California Thermal Plan is the 1972 Water Quality Control Plan for the Control of Temperature in the Coastal and Interstate Waters and Enclosed Bays and Estuaries of California.

Control Board, and the Bay Conservation and Development Commission would also oversee various aspects of the dredging, installation, and operation of the intake structure. Compared to the proposed project, which would not use seawater for any purpose, construction and operation of the Unit 7 alternative with the once-through cooling option would cause substantially greater impacts to marine water quality.

The Potrero Power Plant Unit 7 alternative with the hybrid cooling option would avoid the impacts to marine water quality by eliminating use of seawater for any purpose. This option would use recycled water from the SEWPCP for cooling. The secondary effluent water would be delivered from the SEWPCP and returned as blowdown and sludge water in new pipelines that would essentially avoid impacts to surface water during all phases of operation. With the hybrid cooling option, the Unit 7 alternative would result in impacts to water and soil resources that would be similar to those of the proposed SFERP.

Worker Safety and Fire Protection

The Potrero Power Plant Unit 7 alternative would be located within an existing industrial area that is currently served by the San Francisco Fire Department. The fire risks of this alternative would be similar to those of the surrounding existing uses, including the existing Potrero Unit 3 Power Plant, and thus would pose no new or different demands on local services.

Similar to the proposed project, it would be appropriate for the project to provide a Project Demolition and Construction Injury and Illness Prevention Program and a Project Operations Safety and Health Program in order to ensure adequate levels of industrial safety.

Engineering Assessment for Potrero Unit 7 Alternative

Facility Design

The facility design of the Potrero Power Plant Unit 7 would be similar to that of the SFERP. A combined-cycle plant (i.e., Potrero Unit 7) would require more major equipment and structures than a simple-cycle plant (i.e., SFERP) due to the addition of the steam turbine(s), Heat Recovery Steam Generator Unit(s), and the condenser and cooling system. However, these equipment and structures are standard and staff does not analyze them in the Facility Design section.

Therefore, similar to the proposed project, staff-recommended measures may be appropriate to ensure compliance with engineering laws, ordinances, regulations and standards applicable to the design and construction of the project.

Geology and Paleontology

Strong seismic ground shaking (peak ground acceleration of 0.6g to 0.65g) is probable at the site, although no active faults are known to cross this site. Liquefaction potential also presents an adverse site condition. Adequate design parameters for the facility would need to be determined through a site-specific evaluation by a Certified Engineering Geologist or Geotechnical Engineer.

mpacts due to seismic hazards and soil conditions would be addressed by compliance with the requirements and design standards of the California Building Code. Based on the previous staff assessment for Potrero Power Plant Unit 7, impacts to geologic resources would not be expected (CEC 2002a). Mitigation of potential impacts to paleontological resources could be accomplished with construction monitoring by a paleontological resources specialist and salvaging of any identified fossils. These impacts and the measures for mitigation would be similar to those of the proposed project.

Power Plant Efficiency

Project fuel efficiency, and therefore its rate of energy consumption, is determined by the configuration of the power producing system and by the selection of equipment used to generate power. The two-on-one combined-cycle power plant design of the Potrero Power Plant Unit 7 project is capable of achieving an overall fuel efficiency of approximately 56 percent. The SFERP, a simple-cycle peaking facility, would achieve an efficiency of approximately 36 percent (SFERP 2004a). Although the efficiency of SFERP is high for a simple cycle plant, the Potrero Power Plant Unit 7 would provide a much higher thermal efficiency. Unfortunately, the two-on-one combined cycle configuration of the Potrero Power Plant Unit 7, which is well suited for baseload electrical generation, is not suitable to meet the project objective of supplying peaking power to the City of San Francisco. The simple cycle configuration of the SFERP is well suited for providing peaking power due to its short start-up time and fast ramping[4] capability, which the combined cycle configuration of the Potrero Power Plant Unit 7 is not able to achieve.

The gas turbines that would be employed in either Potrero Power Plant Unit 7 or the SFERP represent two of the most modern and efficient such machines now available.

Power Plant Reliability

Industry statistics for availability factors (as well as many other related reliability data) are kept by the North American Electric Reliability Council (NERC). NERC continually polls utility companies throughout the North American continent on project reliability data through its Generating Availability Data System (GADS), and periodically summarizes and publishes the statistics on the Internet (http://www.nerc.com). The Potrero Power Plant Unit 7 combined cycle facility would be designed to operate as a baseload facility. NERC reports that the availability factor for combined cycle units of all sizes was 89.94 percent as compared to the 91.05 percent for simple cycle units of all sizes, for the years 1998 through 2002 (NERC 2003). While the SFERP, which is designed as a simple cycle peaking facility, enjoys a slight advantage in overall availability over the combined cycle facility, any difference between the two configurations in overall availability will be relatively insignificant.

The gas turbines that will be employed in either the Potrero Power Plant Unit 7 or the SFERP have been on the market for several years now, and can be expected to exhibit typically high availability to operate when called upon.

[4] Ramping is increasing and decreasing electrical output to meet fluctuating load requirements.

The fact that the Potrero Power Plant Unit 7 project consists of two trains of gas turbine generators/HRSGs provides inherent reliability. Failure of a non-redundant component of one train should not cause the other train to fail, thus allowing the plant to continue to generate at reduced output. The SFERP consists of three combustion turbine generators configured as independent equipment trains, which also provides inherent reliability. A single equipment failure cannot disable more than one train, thus allowing the plant to continue to generate (at reduced output).

Therefore, both the SFERP and the Potrero Power Plant Unit 7 project should provide an adequate level of reliability, however Potrero Unit 7 is slightly less preferred because a simple cycle plant, such as SFERP, would be able to get online faster and the Potrero Unit 7 design would have only a single condenser servicing all of the turbines, which could create a redundancy problem that could lead to the entire facility going down in the event of failure. At SFERP, each of the three turbines could continue to operate independent of problems at the other turbines.

Transmission System Engineering

The Potrero Power Plant Unit 7 combined-cycle facility would satisfy a basic objective o SFERP to provide generation within San Francisco. Compared to the proposed SFERP, the substantially greater electrical output of this alternative would require some mitigation measures potentially including a system protection scheme and replacement of circuit breakers. SFERP requires no mitigation measures. The electricity from the Potrero Power Plant Unit 7 alternative would travel through two paths: an interconnection to the existing Potrero Substation, and an underground 115 kV transmission line for approximately 1.8 miles in city streets to the Hunters Point Substation. Compared to the proposed project, this alternative would alleviate the neec for future transmission improvements in the region by introducing a substantial new source of reliable, base-load power within San Francisco.

TRANS BAY CABLE PROJECT

Background

The CA ISO's San Francisco Action Plan, approved by the CA ISO Board in November 2004, defines the new facilities that are necessary before the CA ISO would release all existing in-City generation at Hunter's Point and Potrero Power Plants from applicable RMR agreements (SFPUC 2005a). The SF Action Plan represents the interests of stakeholders who have participated in the public process, and is considered by those stakeholders to be the most direct path to achieving the goal of retirement of all older generation at Hunters Point and Potrero, while at the same time meeting the reliability requirements for the entire San Francisco Peninsula Area (DeShazo 2005). Assuming the approval of the SFERP, the Plan will be fully implemented by the end of 2007 with the proposed SFERP as an integral part of the Plan.

From the CA ISO's perspective, for the Trans Bay Cable Project to be considered an alternative to the SFERP would imply that the Trans Bay Cable Project could replace the SFERP in the SF Action Plan. Neither the CA ISO nor the stakeholders concur with that assertion, because the Trans Bay Cable is being planned to *follow* the SF Action Plan to establish a long-term reliable load-serving project for importation of electric

power. The Trans Bay Cable is tentatively scheduled for completion in the fourth quarter of 2008 which is beyond the need of the SF Action Plan (DeShazo 2005). The CA ISO considers the Trans Bay Cable as an alternative to the SFERP only in that it would augment the long-term load serving capability for the San Francisco Peninsula Area, but the implementation of the SF Action Plan (which includes SFERP) is presently the appropriate solution for the San Francisco Peninsula Area to remove the existing Hunters Point and Potrero Power Plant generator units from RMR status as soon as possible (DeShazo 2005). Overall, in the CA ISO's view, the 400-MW Trans Bay Cable Project would add its load-serving capability *in addition to* the SF Action Plan and it would not take the place of part(s) of it. The timing of the Trans Bay Cable Project is to be in place as needed and justified following successful completion of all parts of the Action Plan.

In deciding on a preferred long-term alternative to serve load beyond 2007, the reliability and economic aspects of the Trans Bay Cable are currently being evaluated against other transmission alternatives which could be built by PG&E (DeShazo 2005). As stated in the SF Action Plan, "at this time, the proposed DC Cable is an alternative to augment long-term load serving capability for the San Francisco Peninsula area. In deciding on a preferred long-term alternative to serve load beyond 2007, the reliability and economic aspects of the proposed project will be considered and compared to PG&E reinforcing the existing transmission system or building a new 230 kV line to increase power imported into the San Francisco Peninsula" (Edwards 2004a).

The environmental review process and the preparation of an Environmental Impact Report for the Trans Bay Cable Project are scheduled to occur in 2005-2006.

While the Trans Bay Cable Project is an "alternative" means of satisfying load demands on the San Francisco peninsula and it is thus included as an alternative in this Staff Assessment, it would fail to meet the critical project objective of satisfying the CA ISO reliability criteria such that it would allow the shutdown of older, existing generation at Hunters Point and Potrero Power Plants. It would thus fail to feasibility attain the key project objective, which would allow for the closure of existing, higher-polluting generation in the City (Cal. Code Regs., tit. 14 §15126.6). As a result of continued operation of those older facilities, it would not in an overall sense "substantially lessen the significant adverse impacts of the proposed project on the environment" (Cal. Code Regs., tit. 20, §1765).

Alternative Description

The Trans Bay Cable Project is a high voltage direct current (HVDC) transmission line that is being proposed by Trans Bay Cable LLC, an affiliate of Babcock & Brown, a Sydney, Australia-based Company with its major overseas office based in San Francisco, in cooperation with the City of Pittsburg and Pittsburg Power Company, a municipal utility. Siemens Transmission and Distribution Company, using Pirelli cable and installation technology, will provide converter technology and construction management. The City of Pittsburg will serve as the lead agency for the purposes of CEQA review and compliance. The Project would transmit electrical power and provide a dedicated connection between the East Bay and the electrical system in San Francisco.

The Trans Bay Cable Project is presently configured to extend from PG&E's Pittsburg Substation near Pittsburg, California to PG&E's Potrero Substation in San Francisco. At each end of the HVDC transmission line, a converter station will be installed to convert the power from system alternating current (AC) to or from direct current (DC) (Babcock & Brown 2004).

The Pittsburg converter station would be located at 1301 Standard Oil Avenue. The site is zoned General Industrial (IG) and it is currently used as an auto storage yard with two abandoned water storage tanks (approximately 4,000 square feet combined) on the site. The Pittsburg location was chosen was chosen for the origination of Trans Bay Cable project in part because of the large amount of available generation in the area. In Contra Costa County there are 26 operational power plants (listed in **ALTERNATIVES Table 4**) with total online output of approximately 4,364 MW into the regional grid (though not all of this generation would be transmitted via the Trans Bay Cable). In addition, an additional 530-MW plant (Mirant's Contra Costa Unit 8) was approved by the Energy Commission in May 2001, but has not yet been constructed.

ALTERNATIVES Table 4
Operational Power Plants in Contra Costa County

Plant Name/Unit #	Capacity (MW)	Plant Name/Unit #	Capacity (MW)
Pittsburg #5 and #6	1,332	Tosco SFAR Carbon	27
Delta Energy Center	861	Wilbur East Coal Power Plant	19
Contra Costa #6 and #7	672	Wilbur West Coal Power Plant	19
Los Medanos Energy Center	555	Loveridge Rd Coal Power Plant	19
Crockett Cogen	247	E. Third Street Coal Power Plant	19
Richmond Cogen	125	Nichols Road Coal Power Plant	19
Foster-Wheeler Martinez Cogen	113	C & H Sugar #1, #2, #3	10
Martinez Refining Co.	99	Rhone-Poulenc-Stauffer Chem.	4
Calpine Pittsburg	74	Chevron – Concord	3
San Francisco Refinery	49	Nove WTE Power Plant	3
Riverview Energy Center	47	Brookside Hospital	1
Mobile GT #1, #2, and #3	45	City of Concord	0.1

Source: Energy Commission Energy Facilities Status at http://www.energy.ca.gov/sitingcases/all_projects.html

At the San Francisco end, a second converter station would be installed to convert the electrical power from DC back to system AC. The applicant is exploring various site options for the San Francisco converter station and has not yet selected a preferred site. However, in this analysis, the HWC Property, located east of Illinois Street between 23rd and 24th Streets, is assumed. The analysis presented herein would need to be modified based on the final site selection.

The Trans Bay Cable Project would include installation of approximately 59 miles of HVDC sub-sea cable in the bottom of San Francisco Bay from a Converter Station to be constructed in the City of Pittsburg in Contra Costa County to a Converter Station to be constructed in the City of San Francisco on near Potrero Point.

The primary goal of the Trans Bay Cable Project is to deliver generator-like electricity to San Francisco to meet demand projected for the period 2011 and beyond. The project is anticipated to meet the CA ISO planning and reliability standards and would decrease transmission grid congestion in the East Bay, reduce transmission losses, increase the overall security and reliability of the electrical system, and provide potential savings to ratepayers. The Trans Bay Cable Project would consist of the following major components:

- Approximately 59 miles of sub-sea HVDC cable transmitting up to 400 MW of electrical power utilizing 400 kV DC from Pittsburg to San Francisco.
- Proposed 7.5-acre Converter Station site in Pittsburg (AC/DC).
- Proposed 6.1-acres Converter Station site in San Francisco, (DC/AC).
- Short segments of AC interties between the proposed Converter Stations and the existing electrical substations (i.e., PG&E's 230 kV Pittsburg Substation in East Bay and the PG&E's Potrero 115 kV substation in San Francisco).
- Connections to the existing PG&E Pittsburg and Potrero substations.

The project is scheduled to take approximately 27 months to engineer, manufacture, construct, start up, test and bring into commercial operation. Project approvals, permitting and development activities are scheduled to be complete by the summer of 2006. Following permit approvals, detailed engineering and construction activities would begin. Based on this current schedule, the Trans Bay Cable Project would be ready for commercial operation in late 2008.

See **ALTERNATIVES Figure 7** for the proposed cable route and Converter Station locations. See **ALTERNATIVES Figures 8** and **9** for preliminary diagrams of the proposed Converter Station locations and related facilities in Pittsburg and San Francisco, respectively. The proposed cable route is anticipated to cross several sub-sea pipelines and utility cables. The project will be designed to minimize any potential impacts to these existing facilities.

Pittsburg Converter Station. The preferred location for the Converter Station in Pittsburg is at 1301 Standard Oil Avenue (APN 073-023-07), on a lot of approximately 7.5 acres in size (see **ALTERNATIVES Figure 8**). The zoning is IG (General Industrial), and the current land use is as an auto storage yard. There are currently two existing, but abandoned, water storage tanks on the site, but no other structures. The Station will consist of an approximately 60-foot-high DC valve hall, and control building enclosure. This enclosure will occupy approximately 47,000 square feet. The balance of the site is open and will be occupied by AC and DC bus work, AC filters, a closed loop cooling system, and transformers. The site will be surrounded by an architecturally-appropriate wall or chain-link fence. The site is located within the City of Pittsburg limits and is

currently occupied by an automotive recycling facility and other small businesses. The AC intertie will consist of a 3 phase, 230 kV transmission line of about 4.5 miles.

San Francisco Converter Station. The applicant is exploring various site options for the San Francisco converter station and has not yet selected a preferred site. However, the analysis presented herein assumes that the Converter Station in San Francisco would be located on the HWC Property, which is east of Illinois Street between 23rd and 24th Streets (see **ALTERNATIVES Figure 9**), south of the existing Potrero Power Plant and substation and north of the proposed SFERP. The portion of the site to be utilized will be approximately 6.1 acres in size and will consist of an approximately 60-foot-high DC valve hall, and control building enclosure. This enclosure will occupy approximately 47,000 square feet. The balance of the site will contain AC and DC bus work, AC filters, a closed loop cooling system, and transformers. The AC transmission line will connect the converter station to the Potrero Substation at 115 kV; the 115 kV line between the two facilities would be installed within 23rd and Humboldt Streets, as well as private roadway within Mirant's Potrero Power Plant property. The converter station in San Francisco would be designed to blend in with the surrounding environment and minimize visual impacts, as practical. (refer to **ALTERNATIVES Figure 9**).

ALTERNATIVES Figure 7. Trans Bay Cable Project

ALTERNATIVES Figure 8. Pittsburg Converter Station and Substation Connection

ALTERNATIVES Figure 9. San Francisco Converter Station and Substation Connection

Technology Utilized by the Project

The Trans Bay Cable Project would use both High Voltage Direct Current (HVDC) and High Voltage Alternative Current technologies. HVDC cable would be used for the entire underwater cable segment between Pittsburg and San Francisco. However, HVAC cables would be used to connect each converter station with PG&E substations.

HVDC technology is available from several manufacturers and has been installed in a growing list of projects around the world. For this project, the proponent believes that HVDC technology has several distinct advantages over High Voltage Alternating Current (HVAC) technology. It is controllable in a manner that mimics generation on the power delivery end and functions somewhat independently of problems in the AC grid. It has negligible magnetic fields and can be more easily and inexpensively buried underground or underwater. HVDC becomes cost effective when transmission efficiency and reduced cable cost, over longer distances, offset the power losses and costs for the HVAC to HVDC conversion stations.

Technology of High Voltage DC Power Transmission

HVDC electric power is transmitted by providing a constant voltage to one end of a transmission line. The current in the line is variable and adjusts itself to respond to the load on the other end of the transmission line. HVDC transmission is controllable in a manner that mimics generation on the power delivery end and is able to function independently of problems in the AC grid. Electric power is transmitted at high voltage to minimize losses and allow use of smaller conductors. For a given conductor size, HVDC systems are able to transmit more power with less transmission loss than are HVAC systems.

Most electric power systems are standardized such that power is generated, transmitted, distributed and utilized as AC power. An HVDC transmission system, such as the proposed Trans Bay Cable Project, must therefore have a converter station to convert HVAC power to HVDC power at the supply end of the transmission system and another station to convert power back to HVAC at the delivery end. A significant advantage of HVDC is that HVDC transmissions lines longer than approximately 25 miles can become more cost efficient than HVAC transmission lines. At these distances, the proponent states that the efficiency of the HVDC system more than exceeds the cost and efficiency associated with the converter stations.

Technology of High Voltage AC Power Transmission

Most electric power transmission and distribution systems are designed to deliver AC power to industrial, commercial and residential customers at voltages required by these users. For AC power, voltage and current vary cyclically at a frequency of 60 Hz by rotating AC generators (1 Hertz = 1 cycle per second). AC power is typically generated in three alternating phases, each of which is converted to transmission voltage and delivered via a separate transmission conductor.

Electric and magnetic fields (EMF) generated by HVAC transmission systems can be problematic. HVDC lines generate a static magnetic field similar to the geomagnetic field of the earth. Unlike HVAC lines, the magnetic field for HVDC lines is not fluctuating

due to the line frequency. Therefore, a magnetic field from a HVDC line will not induce currents in other wires or objects like a HVAC field will. As a result, aboveground HVAC transmission systems require wide, tall towers to provide adequate separation between phases and adequate separation of electric and magnetic fields from the ground, obstacles, vegetation, people and animals. When buried, on land or underwater, HVAC systems require three highly insulated cables. These cables are generally bundled or laid close together so that magnetic fields are reduced as much as possible. However, without very special and expensive configurations and construction techniques, buried HVAC cables are not suitable for transmission of power over long distances, such as is proposed for the HVDC Trans Bay Cable Project.

Description of HVDC Cable

The proposed Trans Bay Cable Project selected Siemens and Pirelli, one of several available manufacturers of HVDC transmission systems designed for underground or buried submarine installation. The HVDC system utilizes the Siemens converter station technology and the Pirelli cable design and installation technology.

The construction of the cables is made up of numerous layers of electrical insulation and other materials that ensure that the cable surface voltage remains at zero, protect the cable against water infiltration, and provide physical protection against breakage of the cable. The cable(s) will be shipped from the manufacturing site to the installation site in coils of appropriate size for the selected installation equipment and methods.

Submarine Cable Installation

With the preferred routing, the HVDC cable will be buried underwater in Honker Bay, Suisun Bay, the Carquinez Strait, San Pablo Bay, and San Francisco Bay. The cable installation will use a specialized cable laying ship and/or barge and specialized equipment to bury the cable. Cable burial depths will nominally be 3 to 6 feet deep in areas of the Bay containing soft sediments. Depths are expected to vary in response to the geophysical make up of the bay floor sediments. Where possible, the cable route selected will avoid shipping channels, anchorages, dredge disposal areas and all other known obstacles. In areas where the cable route crosses shipping channels, the cable will be buried below the maximum dredging depth in accordance with the U.S. Army Corps of Engineers maintenance dredging program.

The cable will be coiled in one or more lengths that will fit on the specially designed cable laying ship and/or barge. It is expected that the cable can be laid in two lengths, of approximately 25 miles each, requiring only a single splice in the underwater section. However, it may be necessary to have more splices if it is necessary to go under (instead of over) existing utility lines (e.g., pipelines and cables) in the Bay. The cable will normally be buried in the floor of the Bay using a jet plow and/or a water-jet trenching machine. Where the cable must be installed at a greater depth (e.g., where it crosses a dredged shipping channel), it may be necessary to utilize a standard clamshell dredge. Where appropriate, the cable will be protected using concrete mattresses, cast iron shells, and/or plastic/rubber sleeves. It is expected that the underwater section of the Trans Bay Cable can be installed in less than 30 working days.

Land-Based Cable Installation

It is expected that a land-based cable installation will require a somewhat different cable specification than a submarine installation. A second cable specification may be required to suit the thermal properties of the underground locations. It is currently anticipated that directional drilling will be utilized where the submarine cable transitions to land. This eliminates the need to trench in shallow water and across the tidal zone in potentially sensitive biological habitat. It is also currently anticipated that the cable will be installed on land via typical cut-and-cover trenching and burial techniques to a depth of approximately 3 feet.

Permits Required

The Trans Bay Cable would have to acquire a variety of permits for its onshore and offshore components. Permitting agencies and jurisdictions would include the following: City of Pittsburg, CCSF, City of San Rafael, California State Lands Commission (CSLC), Bay Conservation and Development Commission (BCDC), U.S. Army Corps of Engineers (USACE), U.S. Coast Guard, California Coastal Commission (CCC), Regional Water Quality Control Board (RWQCB), and National Oceanic and Atmospheric Administration (NOAA).

The major permits for the offshore portion are those required for compliance with the Clean Water Act and the McAteer-Petris Act. Those two permits are described in this section.

Clean Water Act Permitting – U.S. Army Corps of Engineers. Clean Water Act Section 10 and 404 permits from the U.S. Army Corps of Engineers (USACE) would be required in order to lay marine cable across the San Francisco Bay. Nationwide Permit 12 under the Clean Water Act for standard utility line activity could also apply if general conditions are met. This USACE permit would be simpler than receiving the individual Section 10 and 404 permits. While there are several potential environmental and design concerns regarding the permitting, the USACE has stated that a bay crossing would be feasible according to its regulations (USACE 2003). The biggest concerns are the potential for impedance of navigation and/or dredging and the potential impacts to sensitive eelgrass habitat at the bay margins. The Port of Oakland is in the process of analyzing its future operation, which may involve allowing shipments from Pacific Rim ships, which have a deeper draft than the present ships. This allowance would involve deeper (minimum of 50 feet) and/or more frequent dredging of the federally maintained shipping channel beneath the Bay Bridge. A transmission cable would have to be deep enough not to affect this dredging.

McAteer-Petris Act Permitting – Bay Conservation and Development Commission (BCDC). An electric cable installed across the San Francisco Bay would require a permit from the BCDC. Because the proposed SFERP Project is a feasible upland alternative that would avoid a bay crossing, there are regulatory feasibility constraints associated with the BCDC under the McAteer-Petris Act and the *San Francisco Bay Plan* that greatly question the ability to acquire project approval in a reasonable period of time (BCDC 2003).

The BCDC's findings and declarations for this alternative would be based on the McAteer-Petris Act, the *San Francisco Bay Plan* (Bay Plan), their federally approved management plan for the San Francisco Bay, and the federal Coastal Zone Management Act (CZMA). According to the McAteer-Petris Act, installation of a submarine cable would be considered as "fill" within the Bay. Section 66605 of that Act mentioned above states that the BCDC cannot approve a project that requires bay fill unless there are no feasible upland alternatives. While the BCDC can override this provision if a project has public benefit that is found to outweigh the impacts of the project, the BCDC has recently been unwilling to approve overrides in similar situations (e.g., Potrero Power Plant Unit 4) (BCDC 2001).

Section 66602 of the McAteer-Petris Act states, in part, that: ". . . existing public access to the shoreline and waters of the San Francisco Bay is inadequate and that maximum feasible public access, consistent with a Proposed Project, should be provided." Section 66632 states, in part, that "[w]hen considering whether a project provides maximum feasible public access in areas of sensitive habitat, including tidal marshlands and mudflats, the Commission shall, after consultation with the Department of Fish and Game, and using the best available scientific evidence, determine whether the access is compatible with wildlife protection in the Bay." The *San Francisco Bay Plan* policies on public access further state that ". . . maximum feasible public access should be provided in and through every new development in the Bay or on the shoreline . . . the access should be permanently guaranteed . . . should be consistent with the physical environment . . . provide for the public's safety and convenience . . . and be built to encourage diverse Bay related activities and movement to and along the shoreline."

The *Bay Plan* policies on Appearance, Design, and Scenic Views state that, "[t]o enhance the visual quality of development around the Bay and to take maximum advantage of the attractive setting it provides, the shores of the Bay should be developed in accordance with the Public Access Design Guidelines . . . . All bayfront development should be designed to enhance the pleasure of the user or viewer of the Bay and maximum efforts should be made to provide, enhance, or preserve views of the Bay and shoreline, especially from public areas, from the Bay itself, and from the opposite shore" (Policies 1 and 2).

Finally, Section 66605(a) and (d) of the McAteer-Petris Act, cited above, provides the Commission authority to require mitigation for loss of surface water area and water volume and other adverse impacts to the Bay bottom habitat. The *Bay Plan* policies on mitigation state, in part, that "[m]itigation should consist of measures to compensate for the adverse impacts of the fill to the natural resources of the Bay . . . [and should provide] area and enhancement resulting in characteristics and values similar to . . . [those] . . . adversely affected . . . [and should be provided] at the fill site, or if the Commission determines that on-site mitigation is not feasible, as close as possible . . . and provided concurrently with those parts of the project causing adverse impacts . . . ." Assuming BCDC would permit the project, the BCDC noted that a project such as installation of a submarine cable would require that CCSF provide mitigation for Bay impacts.

Environmental Assessment for Trans Bay Cable Alternative

The City of Pittsburg, as CEQA Lead Agency for consideration of the Trans Bay Cable Project, issued a Notice of Preparation of an Environmental Impact Report (EIR) in late August 2004. A complete EIR will be prepared to evaluate the Trans Bay Cable Project, as well as alternatives to that project. However, because that EIR was not available at the time that this Staff Assessment was prepared, Energy Commission staff prepared the summary analysis presented in the following paragraphs.

Air Quality

This alternative would cause short-term emissions from site preparation and cable installation during construction. Heavy-duty off-road construction equipment, similar to that needed for SFERP construction, would be used to develop the two converter stations and connections to the existing substations. Similar to the construction of SFERP, Energy Commission mitigation would be necessary to avoid significant air quality impacts, especially from dust that would potentially affect sensitive land uses near the converter stations.

Specialized marine vessels would be used to install the cable in the bay. Power for the marine vessels, including propulsion, plowing, hydraulic systems, and other mechanical systems, would likely come from diesel-powered engines and generator systems on board the vessels. Dredging equipment, if needed, would also be diesel-powered. The marine vessels and generator systems would be large sources of nitrogen oxides, diesel particulate matter, and other contaminants of combustion. These emissions would be similar to those of the heavy-duty off-road equipment used on land, and as with all construction phase emissions, marine vessel emissions would be short-term. The impacts associated with installation of the Trans Bay Cable Alternative would therefore be similar in nature to those of the SFERP, and Energy Commission mitigation could be necessary for ensuring that marine vessel emissions would be minimized.

After construction, the cable would be energized with power provided to the Pittsburg Substation by a number of existing power plants (see **ALTERNATIVES Table 4**, above). Power generated for the cable would cause emissions from a variety of existing and possibly new power plants. Although it would be impossible to identify which power plants would energize the cable, the emissions from each plant would not be beyond those allowed by approvals the Energy Commission licensing process or other approvals. Each plant would need to continue to comply with the air permitting requirements of the Bay Area Air Quality Management District, as they must presently comply in the existing conditions. Staff assumes that no additional generating facility would be built to energize the cable.

The most likely source of power for the cable would probably be Mirant's Contra Costa Unit 8. Approvals for that plant allow emissions of up to 0.075 pounds of NOx per megawatt-hour (MW-hr) (CEC 2002a). This is compared to the SFERP, which would create 0.09 lb/MW-hr (SFERP 2004a). Although there is no way to accurately predict which generating facilities would provide power to the cable (this depends on market conditions and CA ISO dispatch), importing power from Contra Costa County could lead to reduced use of the existing Potrero Power Plant, thus reducing air emissions within San Francisco.

The operations at each end of the HVDC transmission line, the converter stations, and activities at the Pittsburg and Potrero Substations would not be likely to produce measurable emissions. Because no new generating facilities would be built under this alternative, no substantial new air quality impacts are expected to occur during long-term operation, and no locally-oriented mitigation would be necessary.

Biological Resources - Aquatic

Construction of the Trans Bay Cable alternative could have short-term and long-term impacts on the Bay ecosystem; project construction would result in immediate localized effects to the bottom life. Direct impacts could include the loss of coastal salt marsh and eelgrass beds during project construction in the shoreline zone. Indirect impacts could include localized species composition changes in the bay due to changes in predators, prey and competitors. Recolonization could take several months or years after construction is completed.

If project construction occurs in relatively polluted areas (e.g., portions of the Carquinez Strait), contaminated sediments are likely to be dispersed into the water column, resulting in localized, temporary increases in contaminant concentrations that may affect fish and invertebrates.

Although an increase in turbidity resulting from cable installation would not last for long, there could be longer-term consequences for sensitive biological resources. Increased turbidity can reduce the survival of herring eggs, which are attached to hard surfaces on the Central Coast shorelines, potentially resulting in reduced recruitment and abundance of this important Bay species. In certain locations, and during certain times of year, increased turbidity can affect the survival of larval and juvenile stages of certain sensitive fish species, as well as the feeding and migration of adults.

Turbidity could reduce visibility, causing difficulty locating prey. Suspended sediments could also clog gills. Generally, bottom dwelling fish are most tolerant of suspended solids, and filter feeding fish are the most sensitive. Bay bottom disturbance from the Trans Bay Cable installation in the Central Bay during summer months could affect the migration of protected species such as steelhead and Chinook salmon. The San Francisco Bay is an important nursery habitat for juvenile Dungeness crabs, and summer construction activity could affect this important commercial species.

Due to these biological resource concerns, staff believes that the impacts associated with installation of the Trans Bay Cable would be far greater and more damaging to Bay species and their habitats than the proposed project.

Biological Resources - Terrestrial

Construction of landing sites and converter stations could affect state and federal listed species and their habitats such as coastal salt marsh and eelgrass beds located near the shoreline. Since the proposed project will not have any such effects, the Trans Bay Cable alternative is likely to have far greater terrestrial biological resource impacts than the proposed project. However, if the Trans Bay Cable alternative project were

implemented, it would not have any NOx emission concerns for biological resources unlike the proposed project and the other alternatives.

Cultural Resources

Record searches (California Historical Resource Information System and State Lands Commission) and detailed surveys (terrestrial and underwater) for cultural resources that might be affected by the Trans Bay Cable Project alternative need to be conducted. Buildings and structures adjacent to the converter sites have not been evaluated to determine if they met the eligibility requirements for the CRHR. The shoreline environment and bay floor is sensitive for prehistoric and historic period cultural resources. Buried cultural resources may be present at the converter sites and in the vicinity of linear facilities (terrestrial and underwater). After underwater and terrestrial surveys, identified resources that could not be avoided would need to be evaluated for eligibility to the CRHR. If resources are found to meet the eligibility requirements for the CRHR, then mitigation measures would need to be developed to reduce the impacts to less than significant, if possible. Compared to the SFERP site, developing the Trans Bay Cable Project may have the potential to have more of an impact on cultural and historical resources due to the greater ground disturbance required from the DC and AC lines and converter station construction.
To avoid impacts potentially caused by disturbing buried cultural and historical resources from the construction of the Trans Bay Cable Project, mitigation requiring oversight of a cultural resources specialist would likely be necessary during construction.

Hazardous Materials Management

Little hazardous materials would be used in the construction of ancillary land-based facilities and none would be used along the 55-mile underwater cable route. Typical hazardous materials found in similar construction of power grid-related facilities include fuels, welding gases, and solvents. Once construction is completed, no hazardous materials would be used or stored at the converter stations. In regards to hazardous materials, therefore, this alternative would be far superior to the proposed SFERP.

Land Use

The land use analysis focuses on the project's compatibility with the existing and planned land uses, and the project's consistency with local land use plans, ordinances, and policies.

The Trans Bay Cable project would be subject to a number of environmental and regulatory reviews including a federal consistency determination and permit from the San Francisco BCDC. The project would also have to conform to all applicable regulations and general plan goals of the City of Pittsburg, Contra Costa and Solano Counties and the CCSF.

The Pittsburg converter station would be located at 1301 Standard Oil Avenue in the City of Pittsburg. The site is zoned General Industrial (IG) and it is currently used as an auto storage yard with two abandoned water storage tanks (approximately 4,000 square feet combined) on the site. Surrounding land uses are also industrial related. Within

the City of Pittsburg the AC transmission line from the converter station to New York Slough will angle its way through an industrial (IG) zoned district.

At the San Francisco end, a second converter station would be installed to convert the electrical power from DC back to system AC. The applicant is exploring various site options for the San Francisco converter station and has not yet selected a preferred site. However, assuming the Western Pacific site is selected, the site is zoned Heavy Industrial and is surrounded by industrially zoned land uses.

The transmission cable line between the two terminals would consist of one HVDC transmission cable with a separate metallic return cable and one fiber optic communication cable to be fastened in a bundle. The primary and return cables, each approximately 5 and 4 inches in diameter, respectively, would be buried underwater and routed from the Pittsburg converter station into the water at Suisun Bay (New York Slough), through the Carquinez Strait and San Francisco Bay to a landing point near the San Francisco-based converter station.

Impacts of the Converter Sites and Trans Bay Cable. Construction of the converter sites and transmission lines would require the temporary stockpiling of materials and equipment either within the project site or in approved areas. Any impacts to land use would be isolated and short term while construction vehicles and equipment go to and from the sites. The use of construction laydown areas along the transmission line right-of-way would also be temporary in nature and would not displace any existing use. Given the industrial nature of the neighborhoods surrounding the proposed laydown areas in Pittsburg and San Francisco, staff considers this activity compatible and would not be a significant impact.

As noted above in the alternative description, the installation of the bay cable line will be subject to a number of environmental and regulatory permits and reviews. The BCDC will require a federal consistency determination and permit, and other agencies such as the Fish and Wildlife Service, the Coast Guard and the Corp of Engineers will require regulatory permits.

Because of the recreational boating and commercial shipping activities within the Carquinez Strait, San Pablo Bay and the San Francisco Bay, there is some potential for disruption to boating and other marine uses during the installation of the cable along the bay floor. The cable installation activity would need to be scheduled to avoid the key times for commercial and recreational uses of the Bay.

Both the Western Pacific site (if selected) in San Francisco and the Pittsburg converter site are zoned industrial and surrounding land uses are primarily industrial so the proposed uses would be compatible. The sites would not conflict with applicable land use plans, policies, or regulations of the various local planning agencies.

The proposed converter stations and transmission line installations would not cause substantial changes in land use. Any disruption to adjacent uses during construction of transmission lines in the Pittsburg and San Francisco would be temporary in nature, and will not conflict with existing land uses along the transmission corridors. Since the transmission lines would be underground and likely within paved roads, they would not

disrupt or divide the physical arrangement of an established community. Also for these reasons, the transmission line would not restrict existing or future land uses along the route. Overall, the Trans Bay Cable Alternative would be greatly preferred to the proposed SFERP.

Noise

The cable and both converter stations would lie on industrially-zoned property, a significant distance from sensitive noise receptors. During construction, typical construction practices, such as employing equipment with properly operating mufflers and restricting noisy work to daytime hours, would provide adequate protection from noise impacts. During operation, the cable itself would be silent. Noise from the converter stations (i.e., cooling fans) would be barely audible outside the facility boundaries, and inaudible at any sensitive receptor. Similar to the proposed SFERP, standard design practices and compliance with LORS would ensure no significant noise impacts.

Public Health

No direct public health impacts could be identified due to this alternative. There are no emissions of TACs from this alternative unless the power supply would run a longer period of time than otherwise. In that case, the health risks from emissions from gas turbines and cooling towers are typically below the level of significance. Cumulative impacts would have to be identified and would be dependent upon the incremental increase in operating hours required to provide power to SF and the existing emissions from other sources in the area of the power plant (in this case Contra Costa County). This cumulative impact, however, would be localized and most likely insignificant given past assessments conducted by the BAAQMD and CEC staff.

An indirect impact could potentially be serious if bay mud/sediments along the 55-mile bay cable route release significant amounts of bioavailable toxics such that an increase in fish tissue levels of PAHs, PCBs, mercury, and chlorinated dioxins occurs. Persons who rely heavily on subsistence fishing for their diets and the occasional fisherperson who might be sensitive (children and pregnant woman) might be impacted. An ecological risk assessment and a human health risk assessment would have to be prepared to assess this exposure and risk to public health.

In regards to direct public health impacts, this alternative would most likely be lower than the proposed SFERP. Indirect impacts might make this project equivalent to the SFERP.

Socioeconomics

Staff has estimated the potential socioeconomic benefits from the Trans Bay Cable alternative. This analysis focuses on the Pittsburg power plant site where one of the converter stations would be built; the other would be built near the SFERP site. The benefits from construction of the converter station in Pittsburg include increases in sales taxes, employment, and income for Contra Costa and neighboring counties (see **SOCIOECONOMICS Table 2** for data and information). Staff finds that the Trans Bay Cable project would not cause a significant adverse socioeconomic impact on the study area's housing, schools, police, emergency services, hospitals, and utilities. Based on

staff's demographic screening analysis, the minority population within six miles of the Pittsburg converter station site is about 59 percent and it is 75 percent within one mile of the nearby Pittsburg Power Plant. The low-income population within six miles is 13 percent. In comparison, based on staff's demographic screening analysis for the proposed SFERP project, the minority population within six miles of the proposed power plant site at Potrero is less than 57 percent and the low-income population within six miles is slightly above 11 percent.

Staff finds that there would be no adverse socioeconomic impacts since most of the construction and operation workforce is within the regional or local labor market area and construction activities are short-term. Staff has determined that there would be no significant adverse direct or cumulative socioeconomic impacts and, therefore, there are no socioeconomic environmental justice issues. The Trans Bay Cable project would be consistent with the applicable socioeconomic LORS.

Traffic and Transportation

Traffic in the vicinity of the San Francisco and Pittsburg converter stations would be similar to that of the proposed SFERP. The high level of industrial activity of the surrounding uses generates a substantial level of truck traffic. Similar to the proposed project, before construction could occur for the Trans Bay Cable project, a construction traffic control and transportation demand implementation program would need to be developed in coordination with the City and County of San Francisco and Caltrans. These programs would limit construction-period truck and commute traffic to off-peak periods and avoid potential traffic and transportation impacts.

If barges and vessels used for the construction of the Trans Bay Cable project must anchor or moor in a manner other than to an existing approved dock or pier, they could create a safety hazard to shipping traffic. If the construction barges or vessels must anchor or moor for construction activity away from an approved dock or pier, then they must obtain a wavier from the U.S. Coast Guard Marine Safety Office San Francisco Bay. If this is done, then the Coast Guard will be able to inform barges and vessels operating in the area such that impacts on Bay shipping traffic would be insignificant.

Mitigation necessary to reduce the impacts of this alternative to less than significant levels would include the following: the applicant would inform and coordinate the construction activity with the U.S. Coast Guard, Water Management Branch if it must anchor or moor any barges or vessels associated with the project in any manner other than to an existing approved dock or pier. This would include a letter to the Commanding Officer of the U.S. Coast Guard Marine Safety Office San Francisco Bay, Attention Water Management Branch, Coast Guard Island, Building 14, Alameda, California 94501-5100. This letter would include:

- A full description of the existing conditions/situation, to be followed up with a detail drawing of the area showing large and small scale coverage, in the drawing it should also show the location of equipment and resources clearly marked and spelled out and well defined.
- A statement and similar description on the work to be done and why.

- A time schedule as to when work will start (date and time), how many hours a day operations will be conducted and an estimated date and time of project completion.
- Listing of all persons involved in the operation, their title and job description (Person in Charge of operations, Operations Manager or Site Manager) and information on how to contact this person and their availability.
- A barge break-away contingency plan.
- Listing of on-site communication cellular phone numbers and radio frequencies that are monitored. (Must be VHF-FM Marine Channels 14 and 13)
- A listing of all companies, agencies and groups involved in operation.

Therefore, prior to the start of construction activity in the Bay, the project owner would have to ensure that the U.S. Coast Guard Marine Safety Office is informed about its construction activity in the Bay, and shall obtain the necessary anchorage waiver. The project owner would also have to include in the Monthly Compliance Report, copies of all correspondence with the U.S. Coast Guard and copies of anchorage waivers received for work to be conducted in the Bay.

During construction the Trans Bay Cable Project would have greater traffic impacts resulting from construction activities at converter station sites in both San Francisco and Pittsburg, linear construction of underground transmission lines in roadways, and possible impacts associated with vessel use while constructing the underwater cable. Operational impacts would be similar and both projects would be consistent with the applicable traffic and transportation LORS.

Transmission Line Safety and Nuisance

This project would involve the use of a transmission system that would be much longer and more complex than with the SFERP system in terms of physical extent, reliability, maintainability, ease of repairs, shut-down frequency, and shock and obstruction hazard to fishermen and other marine users. This alternative would increase the sources of electric and magnetic fields and potential human exposures. Given the uncertainty about the health risks from human exposure to direct-current or alternative-current fields, any risk from such field exposures would be much lower for the proposed SFERP project than for this Trans Bay alternative. As a result, the Trans Bay Cable would be less preferable than the proposed SFERP in terms of Transmission Line Safety and Nuisance related to electric and magnetic fields.

Visual Resources

San Francisco Converter Station. The proposed AC-DC Converter Station site is located within San Francisco's eastern industrial waterfront area, near the India Basin Industrial Park. The San Francisco Municipal Railway has proposed the construction of their new Metro East Light Rail Maintenance and Operations Facility north of the site. A proposed main shop and administration building for the facility will be about 40 feet tall and 180,000 square feet.

The AC-DC Converter Station's most prominent visual features include a DC Hall, a Control Building and a switchyard. The 30-to-40-foot-tall DC Hall would be the tallest

structure on the site. The DC Hall's height would be consistent with surrounding industrial buildings, which are 45 feet or less in height. The horizontal block forms and straight lines of the DC Hall's features would appear similar to the form of existing surrounding buildings, and smaller in scale when visually compared to existing structures at the Port of San Francisco North Container Terminal, the Potrero Power Plant and the expanse of San Francisco Bay. The site is partially screened by existing structures. The gray or silver color of the switchyard may contrast moderately with existing structures and the blue hue of the Bay.

Numerous residences at elevated locations on Potrero Hill may have a view of the Converter Station. While residents generally anticipate open, frontal views of a highly urbanized, industrial waterfront landscape, any new industrial features in the view of the Bay would be perceived as detracting from the more scenic elements of the view.

Mitigation would be required to minimize the visual effects of light and glare by such methods as shielding lights, surface treatments and screening in accordance with the CCSF's requirements. Also, BCDC visual policies may be applicable to the proposed Converter Station at this location.

Under the present circumstances, the Converter Station would appear to increase the structural density and limit views of the Bay. However, in the context of the existing complex industrial character surrounding this site and the appearance of various industrial structures and equipment, the Converter Station would not cause an adverse visual change or a significant visual impact. The Converter Station would visually relate to its immediate setting. The Converter Station would not result in a high degree of visual contrast or view blockage and would not be a dominant structure in the landscape.

Pittsburg Converter Site. The proposed AC-DC Converter Station would be located in the City of Pittsburg in a heavy industrial area. Major industrial facilities in the area include the DOW Chemical manufacturing facility and the USS-POSCO steel fabrication plant to the north, and the Delta Energy Center to the east. Also in the area, there are several small cogeneration plants. Power transmission lines, scattered exhaust stacks of industrial facilities, and several water towers are some of the larger, vertical features that are noticeable in the landscape. Steam plumes from a number of the industrial facilities in the region are regularly visible under certain meteorological conditions.

Viewer concern and exposure from Interstate Highway 4 is moderate to high and low to moderate from the Pittsburg-Antioch Highway. Both highways are south of the alternative project site. Views to the north from Highway 4 would include, in addition to the alternative site (undeveloped property), industrial facilities and power transmission lines which currently obstruct views towards New York Slough approximately ¾ of a mile away. Because of the mixed land use patterns visual quality is generally moderate to low.

Because open space areas and corridors with unobstructed views to the water and nearby hills are scarce in much of the region, these areas and corridors have been recognized as sensitive and important to protect by the City of Pittsburg. The City of Antioch, immediately east of the alternative project has identified the importance of

preserving views of the river, distant hills, and local ridgelines and maintaining visual edges and gateways to maintain and enhance its community image. Contra Costa County has recognized that its scenic vistas, especially views of ridges, hillsides, and the Delta area, are major contributors to the perception that the county is a desirable place to live and work and preserving the quality of visually sensitive features of the landscape would help preserve and reinforce the county's landscape character and balance the effects of development (Contra Costa County 1991 General Plan).

In the context of the existing complex industrial character surrounding the site and the appearance of various industrial structures and equipment, this Converter Station alternative would not cause an adverse visual change or a significant visual impact. The Converter Station would visually relate to its immediate setting. The Converter Station would not result in a high degree of visual contrast or view blockage and would not be a dominant structure in the landscape.

As proposed, neither the SFERP nor the Trans-Bay Cable alternative would introduce a significant visual impact into their respective existing settings.

Waste Management

Little solid waste would be generated during the construction of ancillary land-based facilities or along the 55-mile underwater cable route. Typical solid and hazardous wastes generated in similar construction of power grid-related facilities include waste oil, paints, solvents, trash, and construction debris. Nonhazardous solid waste would be disposed of according to LORS. Because the 55-mile bay cable would be placed under bay mud and sediments, some of these sediments may be brought to the surface and collected. If so, these sediments would have to be tested and if determined to be hazardous, disposed of appropriately. Construction of land-based converter stations and perhaps expanded substations and the placing of land cables between these facilities might require the preparation of Phase 1 Environmental Site Assessments (ESAs) and perhaps Phase 2 ESAs. The results of these ESAs will determine the need for any site characterization and site remediation. Once construction is completed, no hazardous waste would be generated at the converter stations. Therefore, in regards to solid and hazardous wastes, this alternative would be either the same or a little better than the proposed SFERP.

Water and Soils

This option will create a significant water quality impact in the Bay. The suspended sediments will require mitigation. There are several permits, which must be obtained before the cable can be placed in the Bay. The construction of the converter stations will also have impacts, which will be similar to the impacts of the SFERP and the East Bay alternative. The permits will have to be obtained for each side of the bay.

Contaminated soils, bay sediments or groundwater could be encountered at the either converter station or in the Bay because of previous activities that may have resulted in chemical spills. Site assessment and remediation may be necessary prior to construction, which would involve participation of the San Francisco Bay Regional Water Quality Control Board, and possibly the City of Pittsburg Fire Department. During

construction and site preparation, if contamination is encountered, mitigation measures consisting of proper testing, treatment, and disposal would be necessary.

Plans for grading and erosion control, dewatering, and storm water pollution prevention would also need to be reviewed by local agencies, including the San Francisco Bay Regional Water Quality Control Board, the San Francisco Public Utilities Commission Bureau of Environmental Regulation and Management, the City of Pittsburg Public Works Department, Contra Costa County Public Works Agency, and the State Water Resources Control Board. These plans, procedures, and measures would be similar to those necessary for development of SFERP.

The Trans Bay Cable Project would be the least favorable option from a water quality standpoint.

Worker Safety and Fire Protection

Worker safety would be protected by adherence to LORS, which include Cal-OSHA regulations. Special attention should be paid to worker safety in marine environments during cable-laying. Fire protection would also be assured by following LORS including the California Fire Code. The converter stations might need to be equipped with automatic fire suppression systems due to the presence of flammable mineral oil in transformers. It is doubtful that the presence of converter stations or expanded substations would place a significant burden on the existing fire or EMS response infrastructure. Therefore, this alternative would have a smaller impact in the areas of worker safety and fire protection than the proposed SFERP.

Engineering Assessment for Trans Bay Cable Alternative

Facility Design

The design and construction of the project shall be in compliance with applicable engineering laws, ordinances, regulations and standards.

Geology and Paleontology

Since the cable will be 4 to 5 inches in diameter and buried approximately 3 to 6 feet deep along the sea floor, except where existing cables will be crossed resulting in possibly deeper installation, unconsolidated marine deposits of varying thickness will underlie the majority of the alignment. The proposed cable will also cross near the Hayward Fault. The Western Pacific alternate site is underlain by artificial fill and at depth by younger bay mud. The Pittsburg terminus is underlain by unconsolidated marine deposits. As a result, strong seismic ground shaking, liquefaction, and possibly fault rupture represent the main geologic constraints for this alternate. Adequate design parameters for the facility would need to be determined through a site-specific evaluation by a Certified Engineering Geologist and/or Geotechnical Engineer.

Impacts due to seismic hazards would need to be mitigated by complying with the requirements and design standards of the California Building Code. Impacts to geologic resources would not be expected. Mitigation of potential impacts to paleontological resources could be accomplished by construction monitoring by a paleontological

resources specialist and salvaging of any identified fossils. These impacts and the measures for mitigation would be similar to those of the proposed project.

Power Plant Efficiency

The Trans Bay Cable alternative does not impact Power Plant Efficiency.

Power Plant Reliability

The Trans Bay Cable alternative does not impact Power Plant Reliability.

Transmission System Engineering

While the CA ISO does not consider the Trans Bay Cable to be an alternative to SFERP, it is being considered by the CA ISO as a way to augment the long-term load serving capability for the San Francisco Peninsula Area (DeShazo 2005). In deciding on a preferred long-term alternative to serve load beyond 2007, the reliability and economic aspects of the Trans Bay Cable are currently being evaluated against other transmission alternatives which could be built by PG&E (DeShazo 2005). Construction of this alternative would avoid any adverse effects to the San Mateo-Martin corridor and at the Martin Substation that could be caused by the Brisbane or SFIA alternative.

Compared to repair of an overhead line or repair of a thermal power plant, repair of an undersea underground line would take much more time. Special techniques must be used to locate the problem and very sophisticated techniques to repair the damage. Unless imports to the Peninsula and local generation were sufficient, power outages could occur. The converter stations are also more susceptible to earthquake damage then power plants, which could result in significant loss of power for the Peninsula. Special design requirements may need to be incorporated to assure reliability of the Peninsula.

NO PROJECT ALTERNATIVE

CEQA requires an evaluation of the No Project Alternative in order that decision makers can compare the impacts of approving the project with what would likely occur if the project were not approved. According to CEQA Guidelines [Section 15126.6(e)], the No Project Alternative must include (a) the assumption that conditions at the time of the Notice of Preparation (i.e., baseline environmental conditions) would not be changed because the proposed project would not be installed, and (b) the events or actions that would be reasonably expected to occur in the foreseeable future if the project were not approved. The first condition is described in this Staff Assessment for each environmental discipline as the "environmental baseline," since no impacts of the proposed project would be created. This section defines the second condition: reasonably foreseeable actions or events and the impacts of these actions.

In this case there is an overlap between the No Project Alternative and alternatives to the proposed project. In this case both the Trans Bay Cable and the Potrero Unit 7 Project are considered in both sections because (a) they meet the project objectives so are legitimate alternatives, and (b) they may occur if the SFERP is not constructed.

The No Project Alternative scenario is based primarily on a series of communications from the CA ISO to CCSF (see Appendix C). Based on these letters and consideration of the Bay Area's electrical situation, the components of the No Project Alternative are assumed to be the following (each component is described in more detail below):

1. **Potrero Power Plant Unit 7 would be installed**. The Potrero Power Plant Unit 7 project application could be reinstated and the project could move forward.
2. **Trans Bay Cable Project would be installed.** Construction of the Trans Bay Cable Project, a 600 MW DC cable from Pittsburg to CCSF, would occur.
3. Hunters Point Power Plant Unit 4 would be closed.
4. **PG&E system upgrades and improvements would occur.** Re-rating and upgrading of certain transmission lines, and installation of a new transformer would improve system reliability and service. The conversion of San Mateo-Martin #4 from 60 kV to 115 kV is now completed, but it is assumed that the Potrero-Hunters Point 115 kV underground cable and the Jefferson-Martin 230 kV Transmission Line Project would be constructed before the end of 2006.
5. **System management and planning would continue to occur.** PG&E and the CA ISO would continue to implement an Interruptible Load Program (allowing the selective load dropping during peak load periods), demand-side management would be encouraged, and curtailment of electric service would be required in the worst-case demand growth scenarios.
6. **Increased utilization of Special Protection Schemes (SPS)** – PG&E and CA ISO are evaluating the implementation of an SPS in CCSF. Though important to pursue regardless of the outcome of the Proposed Project, continued and increased reliance on SPS in CCSF would be insufficient to provide compliance with reliability criteria. Nonetheless, if no other alternative is pursued, at a minimum continued and increased use of SPS in CCSF would be required to provide for controlled involuntary load curtailment during "high load" operating conditions.
7. **Demand-side management would occur.** Energy conservation programs in place by the Energy Commission, CPUC, CCSF, and PG&E would continue to be implemented.
8. **Interruptible load program would be implemented.** This type of demand-side management program could be implemented, which in accordance with contractual arrangements, can interrupt consumer load at times of seasonal peak load by direct control of the utility system operator or by action of the consumer at the direct request of the system operator. This type of control usually involves commercial and industrial consumers.
9. **Curtailment of electric service could occur.** Consumer load would be interrupted at the time of annual peak load by direct control of the utility system operator by interrupting power supply to individual appliances or equipment on consumer premises. This type of control usually involves residential consumers.

POTRERO POWER PLANT UNIT 7

The Energy Commission's proceeding on the Potrero Power Plant Unit 7 Project was suspended based on Mirant's request, but the application could be re-activated. This

project would provide a net increase in in-City generation. Because this project could be built in place of SFERP it has also been evaluated in this Staff Assessment as an alternative to the proposed project.

Mirant Corporation proposed to construct a 540 MW generating facility to expand the existing Potrero Power Plant. The proposed Unit 7 would be constructed adjacent to the existing Unit 3 generator. The Final Staff Assessment prepared by the Energy Commission staff identified significant impacts from use of cooling water from the San Francisco Bay and discharge of that water back to the bay, and prepared a report on alternative cooling technologies. Mirant submitted an AFC amendment presenting the option of using reclaimed water from the CCSF's SEWPCP, and hybrid cooling towers. As discussed above, the Potrero Unit 7 project has also been controversial for potential air quality impacts and environmental justice issues. There is no guarantee that this plant would be approved by the Energy Commission if the proceeding were reactivated. It could also possibly require approval by CCSF or a provision of City wastewater for cooling.

CLOSURE OF POTRERO POWER PLANT UNIT 3

Potrero Unit 3 (207 MW) is significantly beyond its expected 30-year lifetime and is, therefore, inefficient, highly polluting, and subject to frequent outages. As a part of the SF Action Plan (and prior to Unit 3's release from RMR agreements), a Selective Catalytic Reduction (SCR) retrofit of Unit 3 was completed in June 2005, which reduces the NOx emissions to a level of compliance with the air quality requirements of the BAAQMD.

CCSF has requested that the CA ISO define the conditions that would be required to allow closure of Potrero Unit 3, and CCSF believes that completion of the SFERP should provide for closure of generating units at the existing Potrero Power Plant complex (SFERP 2004aa). The SF Action Plan specifies that Potrero Power Plant Unit 3 can be released from the applicable RMR agreement once the three turbines that comprise SFERP and a fourth combustion turbine that CCSF intends to locate at the San Francisco International Airport are operational (SFPUC 2005a). Although the City cannot at this time guarantee that closure of in-City generation will in fact occur, it is the CCSF's objective in pursuing the SFERP to achieve this goal (SFERP 2004aa).

In the absence of the SFERP, given that Potrero Unit 3 would be the only baseload generating facility after closure of HPPP Unit 4, it seems unlikely that this plant would be closed. Therefore, the No Project scenario assumes continued operation of Potrero Unit 3.

TRANS BAY CABLE PROJECT

The Trans Bay Cable Project is a high voltage direct current (HVDC) transmission line that is being proposed by Trans Bay Cable LLC, an affiliate of Babcock & Brown, in cooperation with the City of Pittsburg and Pittsburg Power Company, a municipal utility. It is also included in the San Francisco Peninsula Long-Term Transmission Planning Study Phase 2 Study Plan, Version 3.0 (April 1, 2004). The Project would transmit up to 400 MW of electrical power and provide a dedicated connection between the East Bay and the electrical system in San Francisco. The City of Pittsburg is serving as the Lead

Agency for the purposes of CEQA for the project's upcoming environmental review process.

The Trans Bay Cable Project is described in detail above. The environmental review process and the preparation of an Environmental Impact Report will occur in 2005-2006. Although there is no certainty that this project will be approved and/or constructed, the Trans Bay Cable Project could be built independent of SFERP approval. Therefore, this project is evaluated under the No Project scenario as well as in this Staff Assessment as an alternative to the proposed project.

CLOSURE OF HUNTERS POINT POWER PLANT

HPPP Unit 4 can produce 170 MW and is one of only two baseload power plants in San Francisco (the other being Potrero Unit 3). Its closure, without other system improvements, would greatly affect local reliability. PG&E owns the power plant, and has an agreement with the CCSF to close it as soon as allowable, but the CA ISO is the authority that will determine when it can be closed in order that closure has no serious effects on the region's ability to provide electric service.

The CA ISO letter of April 18, 2003, and the other communications define specific conditions that would be required for the CA ISO to allow implementation of the agreement between PG&E and the CCSF to close Hunters Point Power Plant. While the timing of this closure cannot now be determined, it does now seem likely that the plant will be closed when the Jefferson-Martin Transmission Project is completed (summer 2006).

PG&E PROJECTS CURRENTLY BEING PLANNED OR CONSIDERED

In the revised SF Action Plan adopted in November 2004, the CA ISO listed the projects which are necessary to release Hunters Point and Potrero from their RMR Agreements, ultimately leading to their retirement. These projects are listed in **ALTERNATIVES Table 5**. These projects involve increasing emergency ratings, upgrading or installing new transformers, modifying protection equipment, reconductoring, transmission upgrades, and installing new transmission lines. While these projects would provide a benefit to San Francisco Peninsula electric service and reliability, none (aside from the Proposed Project itself) would provide enough benefits to meet project objectives.

ALTERNATIVES Table 5
PG&E Electric Transmission Projects

#	Project	Description	Schedule	Resolution of Issue
Release Hunters Point Units 2 & 3 from their RMR Agreements				
1	Potrero Static VAR Compensator	Install +240/-1100 MVAR Static VAR Compensator at Potrero Switchyard	Complete (December 2004)	This project allows ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with HPPP Units 2 and 3 released from RMR Agreement.
Release Hunters Point Units 1 & 4 from their RMR Agreements				
2	San Mateo Martin No. 4 Line Voltage Conversion	Reconductor and convert 60 to 115 kV circuit; modify substations at Burlingame and Millbrae.	Complete (July 24, 2004)	This project in combination with other projects allows ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with HPPP Units 1 and 4 released from RMR Agreement.
3	Ravenswood 2nd 230/115 kV Transformer	Install a new 420 MVA, 230/115 kV transformer at Ravenswood.	Complete (May 2004)	This project in combination with other projects allows ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with HPPP Units 1 and 4 released from RMR Agreement.
4	San Francisco Internal Cable Higher Emergency Ratings	To be used upon completion of Jefferson-Martin 230 kV Project. In 2007, a 3rd Martin-Hunters Point 115 kV cable will replace the emergency ratings.	Complete	This project in combination with other projects allows ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with HPPP Units 1 and 4 released from RMR Agreement.
5	Tesla-Newark #2 230 kV Line Reconductoring	Bundling of the Tesla to Newark #2 transmission line.	Complete (May 2005)	This project in combination with other projects allows ISO/PG&E to meet RMR criteria planning requirements with HPPP Units 1 and 4 released from RMR Agreement.
6	Ravenswood-Ames 115 kV Lines Reinforcement	Reconductor Ravenswood-Ames Nos. 1 and 2 115 kV lines with 477 SSAC conductors	Complete (May 2005)	This project in combination with other projects allows ISO/PG&E to meet RMR criteria planning requirements with HPPP Units 1 and 4 released from RMR Agreement.
7	San Mateo 230 kV Bus Insulator Replacement	Replace bus insulator, an operations requirement during San Mateo bus wash.	Complete (May 2005)	Eliminate bus wash at San Mateo 230 kV bus will reduce the 400 MW generation operational requirement down to less than 200 MW.
8	Potrero-Hunters Point (AP-1) 115 kV Underground Cable	Install new 115 kV underground cable; coordinated with CCSF 3rd Street Light Rail Project.	December 2005 (CPUC permit approval granted)	This project in combination with other projects allows ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with HPPP Units 1 and 4 released from RMR Agreement.
9	Jefferson-Martin 230 kV Line	Construct a new 230 kV line from Jefferson Substation to Martin Substation	March 2006 (under construction)	This project in combination with other projects allows ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with HPPP Units 1 and 4 released from RMR Agreement.

ALTERNATIVES Table 5
PG&E Electric Transmission Projects

#	Project	Description	Schedule	Resolution of Issue
10	Potrero 3 SCR Retrofit	Retrofit of Potrero Unit 3 SCR	Complete (June 2005)	This project ensures the availability of Potrero 3 at full capacity thereby reducing overall Greater Bay Area RMR requirements. This project or the reduced capacity available without the retrofit in combination with the other listed projects allows CA ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with HPPP Units 1 and 4 released from RMR Agreements
Release Potrero Unit 3 from its RMR Agreement				
11	SFERP and SFIA Electric Reliability Plant	Construction of 3 combustion turbines north of Martin Substation at Potrero point and 1 combustion turbine at SFIA.	2007?	These projects will allow CA ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with Potrero 3 released from RMR Agreements.
Release Potrero Units 4, 5, & 6 from their RMR Agreements (assumes previous completion of peaking power plants by CCSF)				
12	Newark-Dumbarton 115 kV Line	Upgrade Newark-Dumbarton 115 kV line	May 2006 (engineering in progress)	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with Potrero 4, 5, & 6 released from RMR Agreement
13	Bair-Belmont 115 kV Line	Upgrade Bair-Belmont 115 kV Line (under evaluation by PG&E)	May 2007	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with Potrero 4, 5, & 6 released from RMR Agreement
14	Metcalf-Hicks and Metcalf-Vasona 230 kV Lines	Upgrade Metcalf-Hicks and Metcalf-Vasona 230 kV Lines	May 2007	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with Potrero 4, 5, & 6 released from RMR Agreement
15	Ravenswood Substation Voltage Support	Add voltage support at Ravenswood Substation	May 2007	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet NERC/WECC/CA ISO planning requirements with Potrero 4, 5, & 6 released from RMR Agreement

Source: Edwards 2004a and 2004b.

INTERRUPTIBLE LOAD PROGRAM

As an alternative to constructing various components of the project, selective load dropping[5] during peak load periods could be considered. During the summer of 2001, the CA ISO solicited bids for "interruptible load." This process took the form of two distinct but similar programs in which various loads (customers) would be paid to interrupt or curtail load during peak load conditions. The CA ISO had targeted approximately 2,800 MW of statewide load for these programs. Initially, the CA ISO received bids totaling about 580 MW and currently actual statewide participation amounts to 55 MW. While there are many and varied reasons for the small amount of capacity that is participating in these CA ISO programs, the results point to the fact that there are relatively small levels of load that can contribute in a manner that will effectively and reliably reduce peak loads. The failure to interrupt one's load at the times required is much the same as a local generator not being available or the occurrence of some other contingency. Given the level of constraints with the current PG&E system serving the Bay Area, it is doubtful that interruptible load sufficient to solve these problems could be placed under contract.

DEMAND-SIDE MANAGEMENT (CONSERVATION)

In July 2003, the San Francisco Board of Supervisors approved a $16.3 million joint energy efficiency pilot project with Pacific Gas and Electric Company (PG&E) and San Francisco's Department of the Environment (SF Environment). The San Francisco Peak Energy Pilot Program is designed to increase reliability by reducing peak energy demand for both residential and business customers.

This program is funded by California utility customers and administered by the investor owned utilities under the auspices of the CPUC. The ultimate goal of the program is to reduce electric demand during both the peak summer air conditioning and winter heating seasons. Implementation of the project will include nine energy efficient program elements aimed at reducing usage in San Francisco by 16 MW in January 2005 to assist in the closure of Hunter's Point Power Plant.

Through a portfolio of energy efficiency programs, PG&E and SF Environment will work with hotel/motel, restaurant, and apartment owners. The programs are also designed to assist low-income residents and a special emphasis will target the Bayview-Hunter's Point community.

In addition, PG&E, the investor-owned utility in the project area also uses a program of voluntary reduction in electricity use known as Customer Energy Efficiency (CEE). PG&E has had an active CEE program over the past two decades. Its cumulative reduction of use has been substantial. For any given planning area, the historical CEE energy and peak demand impacts have been subsumed within the peak load demands experienced year by year and thus their impacts are included in the forecast of peak growth. As for future potential CEE impacts, PG&E's Local Integrated Resource Plan (LIRP) study indicates that only 4 MW per year could be obtained through aggressive locally focused CEE.

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[5] Load dropping can be at the discretion of the CA ISO and/or utility, or voluntarily at the discretion of the consumer

Both of these programs provided important reductions in consumption, but they fall short of the long-term capacity needs in the project area, and therefore can only be viewed as an augmentation to other non-traditional wires solution options.

CURTAILMENT OF ELECTRIC SERVICE

During June of 2000, when exceptionally high demand due to a statewide heat wave coincided with the shutdown of units at local power plants and low hydroelectric generation in the northwest, PG&E was forced to institute rolling blackouts (for periods of one to three hours) at various locations throughout its territory. This type of scenario may have to be implemented again at times of peak demand if additional transmission and associated substation infrastructure is not provided. PG&E's load curtailment plans are structured so as to avoid curtailment of critical loads such as hospitals.

CONCLUSIONS REGARDING NO PROJECT ALTERNATIVE

If the No Project Alternative is selected, the SFERP would not be constructed. Energy required for local reliability and peaking requirements that would have been produced by the proposed facility would need to be generated by another source. Currently the sources of power that are available are older power generation facilities (Potrero and Hunters Point power plants). While HPPP Unit 4 is expected to close even in the absence of the SFERP when the Jefferson-Martin transmission line is online, the Potrero Power Plant is not expected to close absent the construction of new in-City generation. These power plants release larger quantities of NOx than the proposed facility and have questionable reliability because they are between 27 and 45 years old.

The proposed project will produce electricity to increase the local electrical system's reliability while discharging less NOx emissions for each energy unit generated when compared to other existing, older fossil fuel generation facilities. Further, the operating flexibility of the proposed combustion turbines, that is, a 10-minute start versus the current 24-hour start times for Potrero 3 and Hunters Point 4, affords operators greater flexibility in dispatching plants to meet system requirements. In addition, Potrero Unit 3 is a boiler facility and therefore has air emissions almost all the time (versus a simple cycle facility that only emits when operating). These characteristics provide beneficial environmental impacts. Potential environmental impacts from the No Project alternative would result in greater NOx emissions because new power plants, including the proposed project, would not be brought into operation to displace production from older, higher NOx -emitting plants.

Staff believes that, overall, the No Project Alternative is not superior to the proposed SFERP for the following reasons:

1. Without the proposed SFERP, it less likely that the Potrero Unit 3 Power Plant would be closed in a timely fashion. The Potrero Unit 3 plant is older, has relatively high emissions, and is not as reliable as a newer facility.

2. Without the SFERP project, staff expects the net emissions of NOx and PM10 in the State would be higher because other older, less efficient power plants (either inside or outside of CCSF) would be required to produce more power.

3. The No Project Alternative may result in (1) building of a power facility elsewhere on the northern San Francisco Peninsula, and/or (2) construction of additional transmission facilities to meet necessary reliability criteria. Depending on their location, these facilities would also have environmental impacts that could be significant.

4. The No Project Alternative would result in reduced reliability for San Francisco's electrical supply.

APPENDIX B: ALTERNATIVES ELIMINATED FROM FULL CONSIDERATION

Alternatives analyzed in detail are presented in Appendix A. This appendix addresses the following categories of alternatives that are not pursued for full analysis in this Staff Assessment:

- Alternative power plant sites
- Transmission alternatives
- Renewable resource alternatives
- Demand-side management
- Distributed generation
- Integrated resources alternative.

ALTERNATIVE POWER PLANT SITES

The alternative sites listed below were evaluated, but not retained for full consideration. Each site is described in the subsequent sections, and its rationale for elimination is described.

- Cesar Chavez Site
- Illinois Street Site
- Pier 70
- Western Pacific Site
- Jessie Street Site
- Southeast WPCP
- Treasure Island
- The Presidio
- Cargo Way
- Gilman Avenue
- East Jamie Court
- Potrero Power Plant Unit 7 FSA Alternatives
- San Francisco Energy Center FSA Alternatives

Cesar Chavez Site

Alternative Description

The Cesar Chavez site is located west of the Western Pacific site, but is not on Port of San Francisco property. The site does not contain historic buildings. The site was presented in the AFC and is located near the Port of San Francisco's container terminal, west of the Western Pacific site. The site is developed and zoned Heavy Industrial. The surrounding land uses are industrial, with the Port's container terminal located to the south, industrial uses to the north. The San Francisco Municipal Railway (MUNI) is currently building a new streetcar maintenance facility due west of the site. The site is 2.8 acres, and includes an occupied building that would require demolition.

The nearest residences are located approximately 1,300 feet from the Cesar Chavez site, as opposed to 600 feet from the proposed SFERP site. The site is 0.4 miles south of PG&E's Potrero Substation, requiring less than 1.0 miles of underground transmission line in roadways. Water supply and discharge would be via the combined sewer system. For the Cesar Chavez site, the transmission interconnection would be

directly to the Potrero substation. Gas interconnection would be with the natural gas transmission line at Cesar Chavez and Illinois Streets (SFERP 2004a).

Rationale for Elimination

Due to the proximity of the Cesar Chavez Alternative to the SFERP site, impacts of this alternative would be similar to those of the proposed SFERP project. However, an additional disadvantage of the Cesar Chavez site as compared to the proposed SFERP site is that the owner has not shown any interest in selling the property to the City, notwithstanding a number of overtures by CCSF to commence negotiations. Moreover, according to the owner, the title to the property may become disputed as it is community property and the owner has been in the process of a divorce (SFERP 2004a).

A further disadvantage of the property is that the parcel size is small (2.8 acres), and at best minimally adequate for the installation of the SFERP. The applicant has indicated that 3.5 acres is the minimum size parcel to site 3 turbines (SFERP 2004q). The small size would require designing the power plant with a compressed layout. This effort would increase construction and maintenance costs for the project. In addition, there would be no space available for a water treatment facility, requiring that this equipment be located elsewhere. Therefore, although this alternative reduced cultural resources impacts and would be located approximately 700 feet farther from residences, due to feasibility issues associated with gaining site control and the small size of the parcel, while also being located in close proximity to the proposed project (approximately 0.4 miles south), this alternative was eliminated from full consideration.

Illinois Street Site

Alternative Description

The Illinois Street site is located 200 feet south-southeast across the street from the proposed project site on the southern side 23rd Street and Illinois Street. The site is approximately 11 acres of developed land that is zoned heavy industrial and is surrounded by industrial uses to the north, south, and east, with commercial/industrial land uses to the west. The setting of the Illinois Street site is very similar to that of the proposed site, and they have the same industrial surroundings (PG&E's Potrero Substation and Mirant's Potrero PP).

The presence of existing industrial structures on the site will require demolition and the site is within 500 feet of residential areas. Although the proposed site would also require the demolition of existing structures, an advantage of the Illinois site is that demolition of historic buildings required at the proposed site would not occur, whereas use of the Potrero site would require demolition of the Compressor House and Station A.

The site is near PG&E's Potrero Substation and natural gas pipeline. Water supply and discharge would be via the combined sewer system. For the Illinois Street site, the transmission interconnection would be directly to the Potrero Substation. Gas interconnection would be at the same interconnection point as the proposed SFERP project, approximately 200 feet from the proposed site (SFERP 2004a).

Rationale for Elimination

Due to their proximity, impacts of the Illinois Street Alternative would be similar to the proposed SFERP project. In addition, ownership of the Illinois Street site is complex, involving multiple owners and real estate trusts. These entities, as represented by the managing owner, have not appeared interested in selling the property to CCSF. Moreover, the shape of the parcel is irregular, including a large amount of land that would be of little use to the City and that contains buildings, such as warehouses from an old sugar refinery. In preliminary negotiations, CCSF was informed that if they proceeded with a transaction at all, the owners would likely insist on sale of the entire parcel because fragmentation would likely render the remaining property unsaleable. Thus, the cost to CCSF would likely increase because the City would be required to buy more property than it needs (SFERP 2004a).

Therefore, given the complex land ownership, and the general lack of interest in a sale on the part of the owners, CCSF deemed obtaining the Illinois Street property to be uncertain. A further disadvantage of the property is that it would likely have required CCSF to acquire substantially more property than needed to site the SFERP with the attendant additional costs and the site is approximately 100 feet closer to residences than the proposed SFERP site. This alternative would not reduce impacts of the proposed project without creating new impacts of its own, and, therefore, the Illinois Street Alternative was eliminated from further consideration.

Pier 70 Site

Alternative Description

This site was evaluated as an alternative in the AFC for this project. The site would be located at the eastern end of 22nd Street approximately 400 feet north of the proposed SFERP site. Most of the Port's property, including most of Pier 70, consists of former public tidelands, which are held in public trust for the people of California. As trustee since 1969 pursuant to the Burton Act, the Port Commission is responsible for managing this property on a self-supporting basis in conformance with the Public Trust Doctrine. Under this doctrine, the Port is required to promote navigation, fisheries, and maritime commerce, to protect natural resources and to develop recreational uses that attract people to enjoy the Bay and waterfront (Wilson 2004). The San Francisco Bay Conservation and Development Commission (BCDC) is charged with ensuring that development of public trust lands on the Bay occurs in the public interest (SFERP 2004a).

For several years the Port has been actively trying to find ways to preserve and develop the historic structures while preserving the present maritime uses. The Port has identified areas of Pier 70 outside of the ship repair area that it would like to find developers for.

A few years ago, a process was started that would have brought in two entities to develop different parts of the area. One entity was a private developer that planned on building several commercial buildings and the other was a group of arts organizations that hoped to develop several historic shipyard buildings into arts facilities. However, in the economic decline of the past 5 years, this initiative has failed.

The planners at the Port have become increasingly concerned about the condition of several of the historic buildings on the Pier 70 site. Two of the most important, Buildings 104 and 113, are unreinforced masonry. Recently the decision was made to mothball them, which means they may not be used or occupied in any way until they have been seismically strengthened. Other structural problems affect the historic structures, including leakage and broken windows. Port planners express a sense of urgency about pursuing "adaptive reuse" of the historic buildings as the only viable way of preserving them (Wilson 2004).

A major non-profit organization, the Exploratorium, expressed tentative interest in Pier 70 as a future home. This innovative science museum considered reusing a number of Pier 70 historic structures. Some public agencies also expressed interest, but were not in a position to move forward quickly. The Port responded to this interest by issuing a Request for Proposal (RFP). This effort began to detail the conditions required of an entity leasing and developing parts of Pier 70. In the spring of 2004, just as the RFP drafting process was nearing completion, the Exploratorium announced that it was looking at a different location on the waterfront for its future home, although a new location has not yet been decided. The Port then concluded that it would not go forward with an RFP at this time, therefore, the future use of this site is uncertain (Wilson 2004).

For the Pier 70 site, electrical interconnection would be to breaker bays located at the north end of the Potrero substation. Natural gas interconnection would be at the same interconnection point as the proposed SFERP project, approximately 750 feet south of this alternative site (SFERP 2004a).

Rationale for Elimination

Due to their proximity, impacts of the Pier 70 Alternative would be similar to the proposed SFERP project and the Pier 70 site would be approximately 400 feet farther from residences. In addition, the Port of San Francisco's Pier 70 site is close to the required infrastructure (natural gas and the PG&E Substation). However, the site is part of a potential historic district and would require either the alteration of historic buildings or their removal. The Port also hopes to eventually redevelop this area in a manner consistent with the Public Trust Doctrine. The Pier 70 location includes significantly more historic structures than the proposed SFERP site. These buildings would either have to be incorporated into the plant design, substantially increasing the cost of the project, or demolished. Therefore, due to greater cultural resources impacts, inconsistency with the Public Trust Doctrine, and potential difficulties obtaining site control from the Port, this alternative would not reduce significant impacts of the proposed project without creating greater impacts of its own.

Western Pacific Alternative, San Francisco

Alternative Description

The Western Pacific Alternative is located in CCSF, adjacent and overlapping the proposed SFERP site on a 9-acre parcel within the San Francisco Port Commission's jurisdiction. The parcel is adjacent to the Port's container terminal, at the eastern end of Cesar Chavez and 25th Streets. The alternative site is undeveloped and borders the San Francisco Bay on its northern and eastern sides. The site is zoned Heavy Industrial

and is surrounded by industrial facilities. The Port of San Francisco's Pier 80 marine terminal is located immediately adjacent and to the south; other industrial uses are located north of the site, and the San Francisco Municipal Railway (MUNI) is currently constructing a streetcar maintenance facility due west of the site. Water, gas, and transmission access would all be similar to the Proposed SFERP.

Rationale for Elimination

The Western Pacific Site is nearly identical to the proposed SFERP, but it is on a parcel further east and adjacent to the San Francisco Bay. Therefore, the construction of the three turbines at the site would create land use and regulatory feasibility concerns. The alternative site is in the State Land Trust and is subject to the public trust for navigation, waterborne commerce and fisheries. In the past, electric power plants that depend upon Bay water to operate have been permitted on trust lands. However, the three turbines that comprise the SFERP do not require a waterfront location for their operation. The common law Public Trust doctrine and the case law interpreting the doctrine recognize that trust lands may be used for purposes that are not inherently water dependent, as long as they directly promote trust purposes. Examples of this type of use would be cargo warehouses or railroad terminals. Since the SFERP does not clearly satisfy the criteria for trust permitted uses, a proposed use of the Western Pacific site for this purpose would be subject to scrutiny by the Attorney General, who is charged with enforcement of trust restrictions, and the State Lands Commission, a state agency responsible for overseeing local trust grantees (CEC 2002a).

The Port plans to develop and integrate the Western Pacific site into its Pier 80 operations through creation of a Pier 80 Terminal Complex, to add open yard and covered shed space to accommodate cargo distribution, assembly and processing related to the Pier 80 terminal operations (SFERP 2004a). As a result, the use of this alternative site may not be compatible with the Port's plans to enhance its marine terminal capabilities at Pier 80. In addition, given the issues of compatibility with the Port's marine terminal plans and the uncertainty as to consistency of the use under the trust doctrine, the use of this location would be lengthy and the outcome uncertain (SFERP 2004a).

The Western Pacific Alternative is also within the Bay Conservation and Development Commission's (BCDC) jurisdiction as the parcel is less than 100-feet inland from the Bay. The use of this site would need to be evaluated under BCDC's San Francisco Bay Plan. The primary issues that will need to be addressed are:

Whether the project would provide maximum feasible access, consistent with the project;
Whether the project is consistent with the Bay Plan policies on appearance, design and scenic views;
Whether the project is consistent with the Bay Plan policies on water quality; and
Whether the project is consistent with Section 66645 of the McAteer-Petris Act and the required "Power Plant Non-Siting Study" approved by the Bay Commission in compliance with the Act.

Use of the Western Pacific Alternative may conflict with plans of the Port of San Francisco, which may develop and integrate the Western Pacific site into its Pier 80 operations. Additionally, because the SFERP would not depend on seawater for any

aspect of operations, use of this site may not be consistent with the common law Public Trust doctrine, which generally reserves the lands for uses that are water-dependent. The Western Pacific Alternative site would not reduce any potentially significant impacts of the proposed project yet would be more likely to create a land use conflict with the plans of the Port of San Francisco and the Public Trust doctrine, as well as raise additional BCDC issues. Therefore, it was eliminated from full consideration in this Staff Assessment.

Jessie Street Alternative

Alternative Description

The Jessie Street Alternative would be located at the NRG/SF Thermal facility at 460 Jessie Street between 5th and 6th Streets, near the U. S. Mint building in downtown San Francisco. The SF Thermal (NRG) facility provides steam heat from four old boilers to certain facilities in the downtown area around the clock. Steam demand varies from 40,000 to 340,000 pounds per hour. Besides the existing power plants at Hunters Point and Potrero, these boilers, which produce approximately 20 ppm of NOx in their emissions, represent the largest stationary NOx emissions source in CCSF (SFERP 2004aa).

The NRG facility has an adjacent Priority Parking commercial parking lot immediately west of the steam plant that is approximately 204 feet long by 162 feet wide. The parking lot would likely be large enough for a maximum of one LM-6000 gas turbine-generator set. The parcel is zoned C-3-S (Downtown Commercial/Downtown Support). Uses are limited to commercial office, retail, and light manufacturing. In addition, the parcel is subject to two height restriction zones, 90-X and 160-F indicating maximum height of structures of 90 and 160 feet (based on an opinion issue in May 1995 by Robert Passmore, San Francisco City and County Zoning Administrator, a cogeneration plant would be exempt from this requirement) (CEC 1995).

ALTERNATIVES Figure 10 depicts residential buildings within the immediate vicinity of the Jessie Street Alternative site. Within a single city block to the east, south, and west of the alternative site, there are well over 620 residential units, all in the form of residential hotels offering weekly and monthly stays to low-income tenants. Immediately adjacent to and overlooking the western end of the parking lot where the turbine would be located there are four buildings containing more than 120 total units. In addition, the Bayanihan House, located at 88 6th Street on the corner of Mission Street (less than 500 feet from the site), is a low-income single-room occupancy (SRO) facility with 120 units. **ALTERNATIVES Table 6** lists the population and demographics for the U.S. Census Blocks of the alternative site and the surrounding area. Approximately 1,595 people live within two city blocks of the Jessie Alternative site with an average minority population of 72.5 percent (U.S. Census 2000).

ALTERNATIVES Table 6
Population and Demographics around the Jessie Alternative

Census Block*	Land Area (square meters)	Residential Population (single race)	Population Density (total population/ 1 square mile)	Non-White Population
1004	8,310	0	0	0
2000**	14,226	72	13,108	73.6%
2001	17,743	74	11,093	73.7%
2002	17,990	13	2,015	78.6%
2003	36,715	469	34,707	58.3%
2004	13,932	77	14,872	70.0%
2005	11,488	474	111,598	90.5%
2010	16,820	416	68,676	67.7%
TOTAL/ MEAN	137,224	1,595	36,581 (excluding Census Block 1004)	72.5%

Source: U.S. Census 2000
*All of the identified Census Blocks are within Census Tract 17601.
**The Jessie Alternative is located within Census Block 2000.

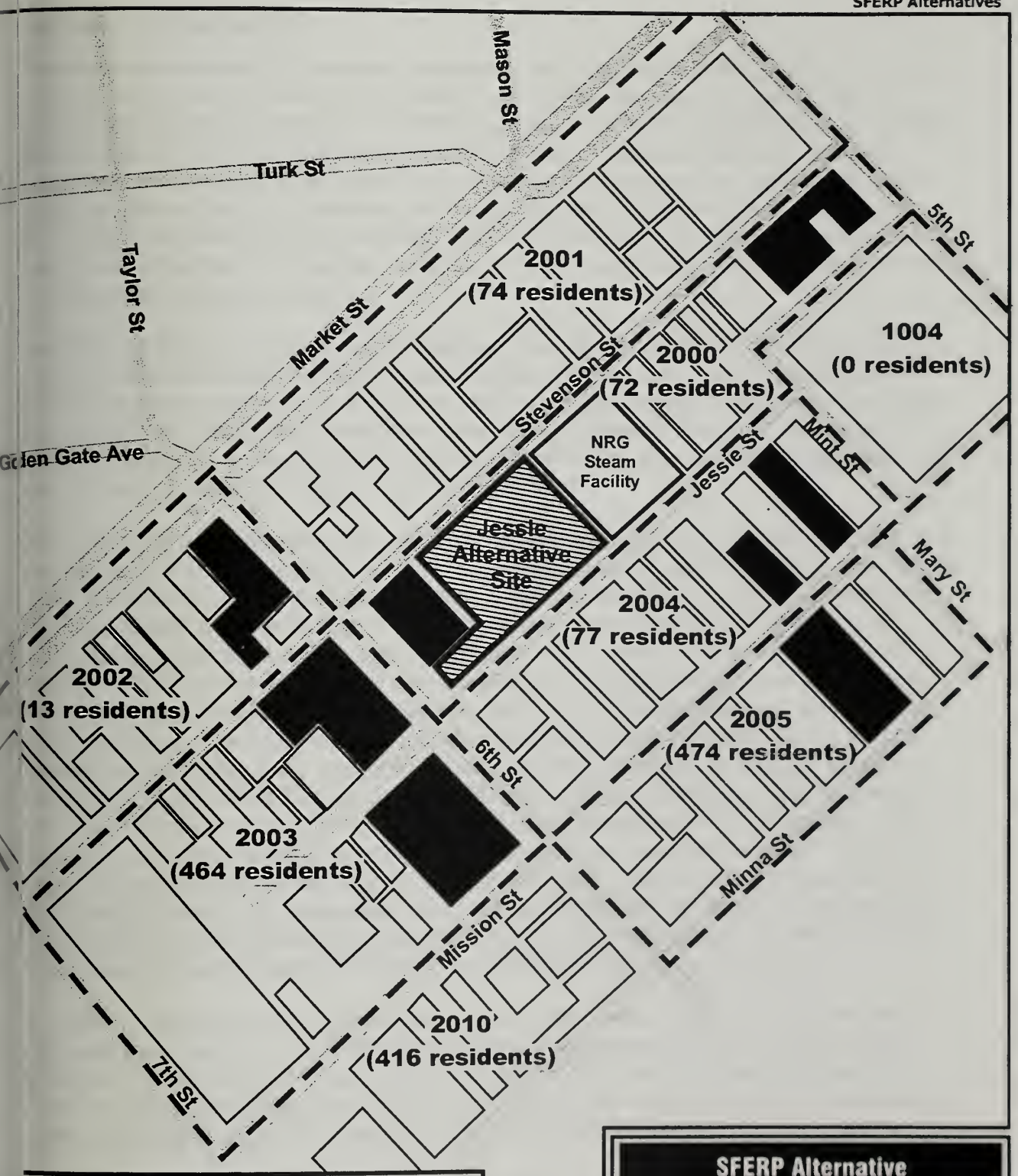

Figure 10

Residential Land Uses Near the Jessie Street Alternative Site

Rationale for Elimination

The site is surrounded by inhabited commercial and residential buildings that are four or more stories in height. Because the design of a combustion turbine project must include cooling towers, special considerations would be required to ensure that cooling tower plume is dispersed away from and above these buildings. Similarly, exhaust gases from the gas turbine will need to be dispersed at an elevation higher than the roofline of the surrounding buildings. A chimney equal in height to that of the existing steam plant would probably be required. This may have a performance impact on the gas turbine since the manufacturer sets a maximum backpressure (measured in inches of water) at the turbine exhaust.

The NRG facility is a cogeneration facility that would produce steam for CCSF's steam loop. The electrical interconnection would require looping the 115 kV Potrero-Larkin transmission line, located one quarter of a mile from the proposed site, into a new plant substation. The natural gas interconnect was approximately 1.2 miles from the site at 17th and Missouri. A recycled water supply for the facility was not clearly identified but was at least 1.5 miles from the site (SFERP 2004aa)

The Jessie site was eliminated by CCSF due to the high capital costs and financial risks associated with stipulations in the DWR Power Purchase Agreement (PPA). The capital costs of the Jessie Alternative ($87 million) versus the airport ($38 million) differed on the order of $40 to $50 million and CCSF had been given informal indication by the DWR that it would resist paying those additional costs under the DWR PPA (SFERP 2004aa). Some of the factors that adversely affect the capital cost of the site include: high utility interconnection costs (especially the 1.2-mile natural gas and recycled water lines), the need to enclose the equipment in a building, limited building space and no construction lay-down area, high PG&E network costs, the need to build an elevated parking structure for NRG's use, and the difficulty in keeping the steam plant operational while the new plant within it is built. NRG has also demanded that the cogeneration design be oversized to meet their total steam load rather than economically designed to meet only part of their normal needs (SFERP 2004aa). The net effect is that the high plant capital costs at the Jessie site cannot be supported by electricity market prices, even estimating the potential impacts of locational marginal pricing. Therefore, CCSF would have to assume substantial risk for the NRG project to move forward.

In addition, under the DWR PPA, CCSF faced a site control deadline of December 1, 2003 and there were no prospects for any kind of agreement with NRG within that timeframe. In a meeting between NRG and CCSF, NRG had indicated that some of CCSF's assumptions about operations would not be workable given NRG's operational needs, resulting in additional costs at the site (SFERP 2004aa).

A power plant would not be consistent with land use restrictions imposed by the C-3-S zoning designation. In addition, there are also potential air emission impact concerns given the configuration of the residential and commercial buildings surrounding the site. With many residential units directly adjacent to the parking lot site to the west and over 620 units within a city block, there is high potential that air emissions would directly affect these residents. There would also be environmental justice concerns in the area, due to the low-income status of the residents.

From a purely technical standpoint, a cogeneration plant located at NRG could be permitted within accepted Federal and State air emissions standards (SFERP 2004aa). By displacing some of the output of the existing process steam boilers, that have relatively high emissions, with a modern combustion turbine in a cogeneration configuration, the net regional air emissions impact is reduced due to efficiency gains.

However, the cogeneration plant which now produces both electric and steam energy produces more total energy at the NRG location and so more fuel is consumed at this location. Correspondingly, net air emissions at the NRG location increase. Due to the combination of NRG's location near the downtown area and the relatively low buoyancy of the emission sources (due to the much cooler exhaust stack temperatures and adjacent tall buildings), the largest concentrations of these air emissions would occur in CCSF. In contrast, the largest concentrations of air emissions from combustion turbines located at either the airport or the proposed SFERP site will occur over the Bay. This is due to a combination of factors including the site location near the eastern shoreline, greater buoyancy of exhaust gases and predominant westerly winds at the time of year that the combustion turbines are most likely to operate (SFERP 2004aa).

Finally, this site would accommodate only a single turbine, and the SFERP project as proposed is for three turbines. For all of the reasons defined herein, consideration of this site as an alternative is not merited.

Southeast WPCP

Alternative Description

CCSF reviewed the Southeast Water Pollution Control Plant (SEWPCP), where the abandoned sludge drying facility is currently located, as a potential site for SFERP. The site is adjacent to an asphalt plant and I-280. Building a new combustion turbine would require removal of an existing exhaust stack that is taller than the combustion turbine stack.

Electrical interconnection would require looping the proposed Potrero-Hunters Point 115 kV cable[6] into the site. The site is located approximately 0.3 miles from the future location of the cable. Natural gas interconnection would be approximately 0.5 miles from the site near Highway 101. Water and sewer service would have been provided by the SEWPCP (SFERP 2004a).

Rationale for Elimination

This proposed site was not evaluated by CCSF because the communities in the vicinity of Hunters Point Substation have borne and continue to bear the impacts from substantial industrial activity, most notably the Hunters Point Power Plant and the SEWPCP itself (SFERP 2004a and SFPUC 2005a). In addition, there are potential land use impacts associated with nearby residences. Thus CCSF did not consider siting new City-sponsored generation in the Hunters Point area where the SEWPCP is located.

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[6] PG&E has proposed construction of an underground 115 kV cable that would pass the northwest side of the WPCP along Evans Avenue. This proposal is currently being evaluated by the CPUC in Application A.03-12-039.

Treasure Island

Alternative Description

This alternative was suggested by members of the public during the course of the public scoping period for the SFERP. Treasure Island is a 450-acre manmade island, which is attached to a natural island, Yerba Buena Island (547 acres). It is located in the San Francisco Bay, approximately 2 miles east of San Francisco and 4 miles west of the Port of Oakland. The island can be reached by motor vehicle only via the San Francisco-Oakland Bay Bridge.

Treasure Island was constructed in 1938/1939 for the purpose of hosting the Golden Gate International Exposition to celebrate the engineering marvels achieved by the completion of both the Golden Gate and Bay Bridges, as well as acknowledge the ascendancy of California and San Francisco as an economic, political and cultural force in the increasingly important Pacific region (TIDA 2004). The construction of Treasure Island began in February 1936 and was completed in January 1939. To build the island, 29 million cubic yards of sand and gravel were dredged from the Bay and the Sacramento River delta and approximately 259 thousand tons of rock were used to create a rock seawall to contain the Island. Therefore, the island is generally underlain by about 30 feet of artificial fill material, which overlies 20 to 30 feet of soft, Young Bay Mud. Significant ground liquefaction occurred here during the Loma Prieta Earthquake in 1989 (CEC 1995).

Starting in 1997 when the naval station closed, CCSF became the primary steward of the island and created the Treasure Island Development Authority (TIDA), a non-profit, public benefit agency dedicated to the economic redevelopment of the island. The Treasure Island Conversion Act of 1997 granted the TIDA the powers of a California Redevelopment Agency, as well as the rights to administer Tidelands Trust property, subject to certain duties and responsibilities of the California State Lands Commission.

Although the availability of usable island space for a power plant is unknown, most likely such a facility would be sited on the north side of the island because it is more industrial (CEC 1995). Regardless of its location on the island, a power plant would most likely impact a variety of land uses. As a naval station, there were both industrial and residential areas on the island. Current land use on the island is also mixed, with former naval personnel and family housing, commercial land uses, small ship docking facilities, old service barracks, a combined elementary and middle school, a charter high school, and various entertainment and recreation facilities.

In January 1999 the TIDA authorized then-Executive Director Annemarie Conroy to sign a contract with the John Stewart Company to rehabilitate, rent and manage approximately 775 residential units on Treasure and Yerba Buena Islands. In addition, TIDA offered housing opportunities to the economically disadvantaged by signing a sublease with the Treasure Island Homeless Development Initiative (TIHDI), a coalition of service-providing organizations. In December 1999 about 50 pioneer families and individuals moved into TIHDI's newly renovated units. TIHDI member organizations now occupy a total of approximately 225 units (TIDA 2004).

Future redevelopment plans include the construction of 2,800 new housing units (33 percent would be made affordable), luxury hotels, a new ferry terminal, new conference and visitor centers, and more than 200 acres of recreational and open space. The Nav and CCSF are still negotiating the complete transfer of the property, which must first undergo extensive environmental cleanup at a cost of between $60 and $80 million.

Treasure Island, with a load of only 2 to 3 MW, receives its electricity at Western Area Power Administration rates via a submarine cable from PG&E's Davis Substation in Oakland. Natural gas is also received from Oakland via a 10-inch submarine pipeline, which operates at 120 psi (Zorzynski 2004). Water, however, is obtained from CCSF o the San Francisco span of the Bay Bridge to a filling reservoir on Yerba Buena Island, which drains down to Treasure Island.

Significant upgrades especially to the PG&E's transmission and natural gas distribution lines would be needed to handle the added capacity for the turbines. Given the construction of the new eastern span of the Bay Bridge, the existing transmission and gas submarine lines from Oakland will have to be relocated (Zorzynski 2004). Depending on the timing of the two projects, the added capacity could be incorporated into the plans for the new lines, however, the upgrades to the lines on the Island would still be necessary and submarine lines to San Francisco would have to be constructed to export the generated power to CCSF. Another option for transmission would be to build new lines to the closest major transmission interconnection at the Embarcadero Substation, located at First and Folsom Streets in San Francisco. This route would require over 2 miles of transmission line, either installed on the Bay Bridge (unlikely due to Caltrans' policies of not allowing new utilities in its ROW) or as submarine cable, and then undergrounded through a highly developed and congested areas in the City.

Rationale for Elimination

There is inadequate infrastructure (transmission lines, natural gas) and geotechnical concerns related to building on fill. Site contamination and cleanup activities associated with the transfer of property to CCSF would make it difficult to construct the turbines within the timeframe required in the DWR PPA, which requires commercial operation by June 1, 2005. Finally, the plans for residential development existing and proposed on the island would also make a power plant at this site incompatible with current and future land uses and the redevelopment plan, because the turbines would be in close proximity to a large number of residences.

The Presidio

Alternative Description

This alternative was suggested by members of the public during the course of the publi scoping period for the SFERP. The Presidio is a 1,481-acre reserve, renowned for its scenic setting and rich historic and natural features. The Presidio is part of the Golden Gate National Recreation Area (GGNRA), and is managed by the Presidio Trust under the Presidio Trust Act, in partnership with the National Park Service. The Presidio has 991 acres of open space as well as 28.5 miles of hiking, biking, and multi-use trails, a golf course, a bowling alley, Rob Hill campground, picnic sites, tennis courts, ball fields, indoor swimming and gymnasium facilities, and windsurfing areas (Presidio 2004).

The Presidio's transformation from military post to national park began in 1972 when Congress created the GGNRA, a vast network of historic sites and preserved open space that today links 75,500 acres along the San Francisco Bay Area coast. In the legislation that established the GGNRA, Congress mandated that the Presidio, then an active U.S. Army post, would become part of the GGNRA if the installation became superfluous to the military.

Because of the former post's city-like infrastructure, its nearly 800 buildings, and its expansive cultivated forest and natural areas, funding the Presidio's operation and long-term care was much more costly than traditional parks. In 1996, Congress devised a management and funding model unique among national parks, and created the Presidio Trust to preserve the Presidio's natural, scenic, cultural, and recreational resources, and to become financially self-sufficient.

The National Park Service manages the Presidio's coastal areas. The Trust and National Park Service cooperate to preserve open space, plan for the trails system, provide for public safety, and offer public programs.

The Presidio itself is a National Historic Landmark with 768 structures, 469 of which are historic. The park includes architectural styles from every major military construction period since 1848, including Italianate, Greek Revival, Mediterranean, and Mission Revival and is a significant archaeology site, featuring prehistoric, 18th century Spanish, Mexican, and American artifacts (Presidio 2004).

In addition, the Presidio shelters 280 native plant species, 16 of which are rare or endangered, such as the San Francisco lessingia and the Raven's manzanita. It features a 300 acre planted historic forest; key species include Monterey cypress, Monterey pine, and blue gum eucalyptus. The Presidio is a refuge for more than 200 species of birds as well as a variety of mammals, reptiles, and aquatic species (Presidio 2004).

The Trust itself preserves, enhances, and maintains the Presidio's interior lands. Using annually declining federal appropriations as well as private investment, the agency is rehabilitating former Army buildings as civilian homes, workplaces, and public facilities. The revenues earned through leasing are used to operate the park, preserve its natural and cultural resources, maintain its infrastructure, and ensure its long-term care. The Presidio Trust is required to operate without direct federal appropriations following a 15-year transition period, which ends at the end of fiscal year 2012 (Presidio 2004).

None of the plans for the Presidio's future include power plant development. In fact, the Presidio Trust Act says, "as part of the Golden Gate National Recreation Area, the Presidio's significant natural, historic, scenic, cultural and recreational resources must be managed in a manner which is consistent with sound principles of land use planning and management, and which protects the Presidio from development and uses which would destroy the scenic beauty and historic and natural character of the area and cultural and recreational resources (P.L. 104-333)" (Presidio 2004). The Final General Management Plan Amendment for Presidio of San Francisco calls for the removal of 276 non-historic and historic buildings to enhance the site's recreational, cultural, and natural resources.

Open in June 2005 on the eastern end of The Presidio is the Letterman Digital Arts Center, a 23-acre campus that houses Lucasfilm divisions such as Industrial Light and Magic and LucasArts Entertainment Company. The Letterman Digital Arts Center is the largest development project approved by the Presidio Trust, which chose Lucasfilm to develop the site in 2000, after evaluating proposals from four finalists. The federal agency says Lucasfilm's $6 million in annual rent is vital for the park to reach financial self-sufficiency by 2013, as mandated by Congress.

Building 1040 was at one time designated as a powerhouse and steam plant. The steam plant consisted of four old boilers, which were used for district heating only for the former Letterman Hospital complex (CEC 1995). There is no power generation. Building 1040 is now closed as an historic building and there are no plans or funds identified for its rehabilitation. The most industrial area in the Presidio, and as a result the most likely location for turbines within the Presidio, would be along Doyle Drive (which is also in the vicinity of Building 1040), although the area is currently planned for redevelopment under the Doyle Drive Expansion project (Pelkas 2004).

At one time an independent developer approached the National Park Service (NPS) and offered to supply district heating at no cost, and sell excess electricity generated energy to PG&E. This offer was refused, because the plan was determined to be inconsistent with the Presidio's national park status (CEC 1995).

Currently, approximately 2,000 people work for a mix of about 150 non-profit, for-profit, and government organizations within the park. Approximately 2,400 people live in the Presidio in 1,000 households (Presidio 2004).

The Presidio's utility systems date from almost every period of the Presidio's history of development as a military installation. Consequently, many of its older facilities have required significant upgrading and replacement and the Trust has an ongoing program of capital investment in its infrastructure systems. Utilities in the Presidio include water treatment, water distribution, wastewater collection, solid waste disposal, and electrical distribution. The Trust has water resource management responsibilities and authorities to provide water to Presidio users. Historically, the Presidio water needs have been met by Lobos Creek water, which is treated at the Presidio Water Treatment Plant (PWTP) and supplemented by water purchased from the SFPUC. In addition, the Army also operated several groundwater wells located near the existing PWTP, golf course and Mountain Lake. These wells were taken out of service before the Trust assumed jurisdiction, and the Trust has no plans to utilize groundwater for future water supplies (Presidio 2002).

Daily flow in Lobos Creek ranges from 1.2 million gallons per day (mgd) in dry years to 2.1 mgd in wet years. Between 0.7 and 1.6 mgd of Lobos Creek water is available in any given year for diversion, treatment and use at the Presidio. Historically the SFPUC has supplied up to one-third of the Presidio's water demand, and several points of interconnection are currently maintained. The amount of water purchased varies by year, however, and last year the Trust purchased approximately 15% of the average daily amount used at the Presidio. In addition to the water conservation, the concept of providing recycled water as a way to reduce potable water consumption for non-potable

uses (i.e., irrigation) has long been considered as a future goal at the Presidio (Presidio 2002). Water for the turbines would most likely have to be obtained from the SFPUC.

In 1999, 21,208 MW-hours of electricity were distributed at the Presidio serving 2.9 million square feet of buildings. The total load capacity of the Presidio's electrical infrastructure is 7,307 kilovolt amps (kVA). PG& E feeders entering into the Presidio currently have approximately 3,000 kVA of spare capacity. Existing current demand at the Presidio is 4,307 kVA (Presidio 2002).

The Trust operates and maintains the electrical distribution system at the Presidio. The system consists of approximately 42 miles of aboveground and underground electrical lines. The Presidio is a bundled service customer of PG& E, and receives electric service at primary voltage at two major points of connection (Greenwich and Main Post substations). The Trust's high voltage department then distributes power to the various facilities at the Presidio. The high voltage department maintains two major substations (Greenwich and Main Post), as well as 12 emergency backup generators at various buildings across the Presidio (Presidio 2002).

The Trust has several ongoing projects and practices to maintain the integrity and reliability of the electrical distribution system at the Presidio including substation upgrade and maintenance. Additionally, the trust is planning a major distribution system condition assessment to establish and prioritize long-term maintenance goals. The Trust is also in the process of completing an Energy Management Strategy, which will establish a framework for meeting projected energy demands at the Presidio. The strategy will evaluate the feasibility of implementing various on-site generation and cogeneration systems, including microturbines, fuel cells and photovoltaic panels. On-site generation will enhance the reliability of the Presidio's electrical supply and demonstrate the commercial viability of these emerging technologies (Presidio 2002).

The natural gas distribution facilities at the Presidio are owned and operated by PG&E. In 1990, 6.7 million therms of natural gas were distributed through the system to the U. S. Army and other users at the Presidio. In 1999, 1.2 million therms of natural gas were distributed to users throughout the Presidio (Presidio 2002). The turbine would likewise obtain natural gas from the PG&E system.

Rationale for Elimination

The Presidio is part of the National Park system, and siting a power plant at the Presidio would be viewed by the federal Government as an incompatible land use, inconsistent with the mission of the National Park Service. In addition, the use of a Presidio site has the potential to create significant environmental impacts (greater than those at the proposed SFERP site), most notably to residential land uses (2,400 people live in the Presidio), recreation, cultural, and visual resources. The site would require long transmission lines in order to connect to a 115 kV substation located in downtown San Francisco, and even longer water pipelines to either the SEWPCP (located at 3rd Street and Jerrold Avenue near the proposed SFERP site) or Oceanside Water Pollution Control Plant (adjacent to the San Francisco zoo in the western side of the City)

Cargo Way

This site was approved by the Energy Commission as the site for the San Francisco Energy Company's (SFEC) power plant in 1995. However, the project proponent was unable to secure a lease for the project from the Port Commission, so the power plant was never constructed. The site was also evaluated by Energy Commission staff as an alternative for the Potrero Unit 7 Project.

Alternative Description

This site is on Port of San Francisco land (property SWL 344.1) at the southwest corner of Cargo Way and Amador Street. This site was evaluated an alternative in Mirant's AFC for Potrero Unit 7 and it was evaluated by Energy Commission staff as an alternative for that project. The Cargo Way site is undeveloped but is surrounded by industrial land uses, and the closest residences are approximately five to six blocks to the south. This distance is farther from the nearest residences than is the proposed SFERP site, but generally closer to the Hunters Point residential area (CEC 2002a).

According to the CCSF, this site is zoned M-2, Heavy Industrial, with a maximum structure height restriction of 40 feet. This site is reserved for maritime support uses since it is near Islais Creek Channel. The Seaport Plan does not consider the power plants to be maritime uses. However, the Port of San Francisco in its Waterfront Land Use Plan has declared this site as surplus to maritime needs and recommends changing its designation to allow specified non-maritime uses. On January 10, 1995, the Seaport Plan Advisory Committee issued a set of proposed amendments to the Seaport Plan that would result in the removal of 22 acres from the maritime use restrictions established in the Seaport Plan. This acreage is enough to accommodate power-generating facilities without adversely impacting existing and future maritime uses in this area (CEC 2002a).

A 115 kV transmission line would have to be constructed to the Hunters Point Substation (approximately one mile to the southeast). Natural gas is available in proximity to the site. Water could be obtained from the SEWPCP approximately 0.5 miles south on Jerrold Street and Phelps Streets.

Rationale for Elimination

This alternative site was not evaluated by CCSF because the communities in the vicinity of Hunters Point Substation have borne and continue to bear the impacts from substantial industrial activity, most notably the Hunters Point Power Plant and the SEWPCP itself. In addition there are potential land use impacts associated with nearby residences. Thus CCSF did not consider siting new City-sponsored generation in the Hunters Point area (SFERP 2004a and SFPUC 2005a). The Cargo Way site is located less than 0.25 miles north of Hunters Boulevard and would encounter significant environmental justice concerns. In addition, this site would not reduce impacts of the proposed SFERP project in any issue areas other than cultural resources, without creating new potentially significant impacts of its own.

Gilman Avenue, 3Com Park Area

This site was also evaluated by Energy Commission staff as an alternative for the Potrero Unit 7 Project.

Alternative Description

The site is located immediately east of Arelious Walker Drive and north of Gilman Avenue in San Francisco. This site is currently vacant, and is used as a parking lot for events at 3Com Park. However, the future use of 3Com Park for major events (e.g., SF 49ers football) is in question, and closure of the Park would eliminate the need for use of this site for parking. East of this site is undeveloped park property owned by the State of California (CEC 2002a).

This site is located in a sub area of the South Bayshore Area Plan of the San Francisco Master Plan. This sub area is depicted by the Area Plan as strategic in improving land use quality and housing growth and to stimulate long term economic and employment growth in the perimeter of the Candlestick Point State Recreation Area. CCSF's General Plan identifies this site as a potential future park. This site and most of the surrounding lands are currently zoned M-1 (Light Industrial). However, with the Candlestick Point State Recreation Area and the existing residential neighborhood as the primary adjacent uses, this area is becoming less suitable for industry and more suitable in the long term for housing or live-work use (South Bayshore Area Plan, July 1995).

According to the South Bayshore Area Plan (July 1995), the M-1 zoning class prohibits manufacture, refining, distillation of abrasives, acid, alcohol, asbestos and similar hazardous chemicals as well as other heavy industries. This prohibition should be maintained to assure that these areas are adequately protected and insulated from the adverse impacts of toxic industries (CEC 2002a).

The 115 kV transmission system is less than one mile to the west, and a transmission interconnection to that line would be required. It is assumed that this connection would be underground, following a route generally due west to the Third Street corridor. Water would be obtained from the SEWPCP just one block west of the Third Street corridor at Jerrold Street, less than 2 miles north-northwest of the site. Natural gas is available in proximity to the site.

To the east of the site are the Candlestick RV Park and Candlestick Point State Recreation Area. To the south is 3Com Park with elevated residential areas on the hill slopes to the west of the park. To the immediate west of the site is a gated residential area (Alice Griffith Housing Project) under the jurisdiction of the San Francisco Housing Authority and zoned for moderate density residential uses. To the immediate north of the site are Bay wetlands and more residential areas on the southern slopes of Hunters Point. The True Hope Church of God in Christ, the Bret Harte School, and Gilman Park are also located near the site on Gilman Avenue between Hawes Street and Giants Drive. Gilman Park includes playing fields and playground facilities (CEC 2002a).

Rationale for Elimination

CCSF seeks to continue to develop this area with a mixture of housing types, including middle, moderate, and low-income housing that is reflective of the demographic

character of the South Bayshore area. Given that CCSF seeks to avoid heavy industrial uses in this area, and the existence of several sensitive land uses (i.e., residences, schools, playgrounds, churches, recreation area, etc.) surrounding the site, project development at this site would be less desirable than at the SFERP site. Development of power generating facilities would not be consistent with CCSF's light industrial designation and would be incompatible with the surrounding residential and recreational uses and the associated sensitive receptors. In addition, development at this site could raise environmental justice issues. The Alice Griffith Housing Project, a low-income housing land use, is in close proximity to this site and could be disproportionately impacted by the adverse air quality, noise, and hazardous materials impacts of the proposed project. Therefore, this alternative was eliminated from full analysis.

East Jamie Court, South San Francisco

This alternative site was under consideration for a power plant by AES Corporation in 1998-1999, but an AFC was not submitted to the Energy Commission at that time. According to Steve Carlson, planner with the City of South San Francisco, the Jamie Court site is one of three potential sites in the South San Francisco area that have been under consideration for a power plant at various times between 1999 and during the alternatives screening process for the Potrero Unit 7 Project where it was evaluated as an alternative in 2002 (CEC 2002a). Besides Jamie Court, the other South San Francisco sites were: (1) adjacent to the water treatment plant (eliminated from this analysis due to its small size), and (2) at the San Francisco Airport (evaluated in this Staff Assessment as the SFIA Alternative).

Alternative Description

This site is south of East Jamie Court and east of Haskins Way, south of E. Grand Avenue, adjacent to the CCSF's recycling facility, on the Oyster Point peninsula near Point San Bruno that is due north of SFIA. The site is located directly on the San Francisco Bay (the San Bruno Channel passes adjacent to this shoreline). The site is a vacant lot of about 20 acres (CEC 2002a).

According to the South San Francisco General Plan this site is within an area designated as Mixed Industrial and Coastal Commercial with a 161-foot height limit for structures according to the General Plan's Airport Related Height Limitations. The Mixed Industrial designation is intended to provide and protect industrial lands for a wide range of manufacturing, industrial processing, general service, warehousing, storage and distribution, and service commercial uses. Industries producing substantial amounts of hazardous waste or odor and other pollutants are not permitted under the Mixed Industrial designation. The Coastal Commercial designation allows for a variety of office, limited retail and other low-scale commercial uses with a coastal orientation (CEC 2002a). There are no residences in the immediate vicinity.

The transmission system is approximately 1.3 miles to the west, so construction of an interconnection would be required. Natural gas would be supplied from Line 101 near the Highway 101 corridor.

Rationale for Elimination

This alternative would be south of Martin Substation and would therefore not fulfill the reliability siting objective of CCSF based on CA ISO analysis to ensure the closure of Hunters Point Power Plant (SFERP 2004q). Regardless, a similar site in the vicinity, the SFIA Alternative, was fully evaluated in this Staff Assessment. The SFIA Alternative was chosen for full evaluation because it was found to be preferable to the East Jamie Court site due to of better access to infrastructure (i.e., transmission, water, and natural gas). The East Jamie Court site would have had similar impacts, but would have also required substantially longer linear routes for transmission, water, and natural gas, creating greater environmental impacts.

Potrero Power Plant Unit 7 Project FSA Alternatives

In the FSA for the Potrero Power Plant Unit 7, Staff identified and considered a broad range of potential alternatives to the proposed project in selecting those that qualified for detailed evaluation. The alternatives identified and considered were:

- No Project Alternative
- Five alternative sites (Cargo Way, Tuntex [Brisbane], Gilman Avenue [3Com Park Area], East Jamie Court [South San Francisco], UGG [SFIA])

Other alternatives that were eliminated from detailed consideration in that FSA were:

- Transmission alternatives
- Technology alternatives
- Demand side management
- Distributed generation
- Renewable resources (solar, wind, biomass, hydropower, geothermal)
- Integrated resources alternative.

Several of the sites evaluated in the Potrero Power Plant FSA are addressed above. The following four additional alternative sites beyond those addressed above were addressed (but not evaluated in detail):

- **City Asphalt Plant**: This asphalt preparation facility is located at the corner of Quint and Jerrold Streets in the Bayview-Hunters Point neighborhood, near the SEWPCP. The site is small and triangular-shaped (adjacent to the railroad) and was eliminated from initial screening because, with residential neighborhoods only two to three blocks away to the east, it would not reduce or eliminate any impacts of the proposed project. This site was also considered for the SFEC project, but rejected at the time due to nearby residences and inconsistency with zoning regulations (it is zoned P, public district, limiting uses to governmental services or uses permitted in any NC, neighborhood-commercial zone, within a quarter mile of the subject parcel) (CEC 1995).
- **Carroll Avenue, North of 3Com Park**: This site is currently used as a parking lot for events at 3Com Park, and is located at the east end of Carroll Avenue adjacent to State Park lands. The vacant lot may become less used as events at 3Com Park

are discontinued. However, this site was eliminated because there are residential properties located less than one block away, to the south.

- **South San Francisco, Belle Air Road**: This site is within an industrial area of the City of South San Francisco, east of the 101 Freeway and north of North Access Road near SFIA. The land is used primarily for the City's water treatment facilities, and only a small area would be available for use as a power plant. Therefore the site was eliminated from analysis as an alternative to Potrero Unit 7 due to feasibility concerns and was not considered for SFERP because it is in the same vicinity as the SFIA Alternative but would have greater impacts.
- **3Com Park**: Since the stadium itself may become obsolete in the future, its location was considered for a power plant site. However, because the timing of the potential discontinued use is not certain, there are residences to the north and west. In addition, parklands surround the site. As a result, the site was eliminated from consideration.

San Francisco Energy Company FSA Alternatives

For the Energy Commission's analysis of the San Francisco Energy Company's (SFEC) Project (94-AFC-1), staff initially surveyed approximately 150 sites on the northern San Francisco peninsula and within CCSF. Most were eliminated because of land use incompatibility and the land requirements (a single city block with at least 3 acres). The most promising alternatives that resulted from the SFEC analysis are listed below, along with their rationale for elimination. **ALTERNATIVES Table 7** (following the list) presents a summary of SFEC alternatives (CEC 1995).

- **Port Site:** Proposed site for the SFEC Project (see Cargo Way Site, above), near the Islais Creek Channel and Piers 90 and 92. The Port Site's immediate neighbors were industrial and commercial. However, applicant and the Port were unable to agree on the terms of a lease for this site, therefore, it was never built.
- **Innes Avenue Site**: While SFEC was unable to lease the Port Site, this nearby, privately-owned parcel could have been leased. Located at Innes Avenue, south of India Basin, this site was directly adjacent to a residential neighborhood. SFEC still hoped to lease the Port Site, but felt it had to achieve site control under the Biennial Resource Plan Update (BRPU). The SFEC AFC was thus filed with the facility located at either the Innes Avenue Site or the Port Site. The AFC designated Innes Avenue as "the proposed site" and the Port Site as "the alternative site." Based upon the potential for significant adverse environmental impacts due to the proximity of residences, the Innes Avenue site was found to be greatly inferior to the Port Site (CEC 1995).
- **City Asphalt Plant:** See Potrero Unit 7 Alternatives above.
- **SF Thermal Plant:** See Potrero Unit 7 Alternatives above and the Jessie Alternative under Alternatives Eliminated.
- **Hunters Point Power Plant:** See discussion of sites near Hunters Point Substation in the Alternatives Analysis Completed by the Applicant section above.
- **China Basin Stadium Site:** Immediately south of Southern Pacific Terminal (Caltrain station) bounded by I-280 off ramp and Caltrain at 4th and Berry Streets. A

cogeneration plant was found to be incompatible with the retail and general commercial uses in the immediate vicinity of the site. In addition, because of its proximity to the Caltrain terminal, it could supplant uses, such as office, commercial, and light industrial, that would be more able to take advantage of the proximity to the transit option that the passenger terminal represents. In addition, at the time Caltrans was planning the terminus of the off ramps for I-280 to be on the site.

- **Mission Bay Development:** Bounded on the east by 3rd and the south by 16th Street. To the north and west is the China Basin estuary. Initial analysis at the time indicated that a cogeneration plant would not be compatible with the development plans approved by the City and being implemented by the property owner, Catellus Corporation. While it would be consistent with zoning and height standards, construction of a power plant at this site would have negated years of planning intended to convert this area, formerly rail yards, into a community of residential and commercial uses. Changes to the plan would have required amendments to the Mission Bay specific plan and, hence, the City and County Master Plan (CEC 1995).
- **Rail Yard South of China Basin:** An old Santa Fe rail yard south of China Basin and north of Central Basin. Illinois Street is on the south and Terry Francois Street (also known as China Basin Street) is on the east. This parcel is within the jurisdiction boundaries of the Port of San Francisco and identified in the San Francisco Bay Plan and Waterfront Special Area Plan as reserved for Port priority, or maritime uses. Therefore, this site was eliminated from consideration for SFEC.
- **Cow Palace Site, Daly City:** This site is located on the Cow Palace grounds, an exhibition facility, less than 0.5 miles from Martin Substation. It was eliminated by the SFEC because it was found by the applicant to have poor access to cooling water and natural gas supply constraints. The applicant also stated in their AFC that the site size and configuration would make facility design difficult and zoning changes would be required.
- **Cow Palace Basin**: On the northeast corner of Carter and Martin Streets in Daly City is a deep canyon, which bounds the southwest corner of the Cow Palace Site, behind the old Geneva Drive-In to the west. If graded, there would be approximately 7 acres available for this site. The site is zoned C-3, Heavy Commercial, and land uses in the vicinity are primarily non-industrial. A power plant at this location would be inconsistent with the land use limitations imposed by the C-3 zoning designation and would be highly visible. In addition, the area surrounding the site is a developing residential area.
- **Treasure Island** The rationale for elimination is discussed for the Treasure Island Alternative under Alternatives Eliminated.
- **Hunters Point Naval Shipyard:** South end of Innes or Crisp Avenue. This site was eliminated for the SFEC because a preferred land use alternative was developed and was under review at the time that emphasized low intensity and light industrial uses. The shipyard property was also highly contaminated and undergoing a remediation process.
- **PG&E's H. Martin Substation, Daly City:** This site is located on the southwest corner of Geneva Avenue and Bayshore Boulevard in the far eastern portion of the Daly City panhandle in the Bayshore community planning area. It is designated in

the Daly City General Plan as PU, Public Utility, and most of the site is occupied by PG&E's Martin substation. In addition, the site is in close proximity to numerous single-family residences, an elementary school, and a community park to the south and west of the site.

- **Tuntex Site:** This site is considered as an alternative to Potrero Unit 7 Project and herein as the Brisbane Alternative. It is part of a larger vacant parcel located between Bayshore Boulevard to the west and Highway 101. It was eliminated from SFEC because public infrastructure (i.e., water, sewer, access, etc.) was nonexistent and because the Brisbane General Plan designated the area PD/TC, Trade Commercial Planned Unit Development, which would not support the location of heavy industrial uses in the area.
- **Potrero Site:** Bordered by Humboldt Street (north), 23rd Street (south), Illinois Street (west), and Potrero Point (east). The 540 MW combined cycle Potrero Unit 7 Project, which is considered as an alternative in this Staff Assessment, is located on this site. This alternative site was found to be less compatible with existing and future uses than the SFEC proposed site, because the parcel was closer to active maritime uses existing to the south at the terminus of Army Street and was more likely to be influenced by its port priority use designation and be used for maritime uses.
- **SF Airport Site:** This site was considered as an alternative to Potrero Unit 7 and is also evaluated herein as the SFIA Alternative. No specific site was identified during the SFEC environmental review process but it generally referred to the industrial area east of Highway 101 and north of the main airport terminal. The airport site was less preferred because expanded operations at the airport as illustrated in the Airport Master Plan would have required subsequent expansion and intensification of aviation support services in the vicinity of the airport. Lands used by the SFEC could have displaced necessary airport-related uses. In addition, land uses within and near the runway approach zones are subject to federally mandated height limitations that would preclude construction of a cogeneration plant in a number of locations in this area.
- **Catellus/Port Authority Site (also known as Western Pacific Site):** This site was considered by the applicant in the SFERP AFC. This site is located at 25th Street between Illinois and Michigan Streets. Energy Commission staff fully analyzed this site for the SFEC project and found it to be feasible. At the time to parcel was involved in a transfer of ownership to the Port of San Francisco.

Intervenors for the SFEC project also suggested consideration of other sites, which were deemed infeasible:

- **The Presidio**: See description under Alternatives Eliminated (Appendix B).
- **Alcatraz Island**: As part of the Golden Gate National Recreation Area, Alcatraz Island is under the administration of the National Park Service and was found to be regulatorily infeasible. Space concerns as well as significant environmental impacts were identified, specifically to visual, cultural, and biological resources.
- **Oceanside Water Pollution Control Plant:** adjacent to U.S. National Guard Armory and SF Fleishacker Playground and Zoo, bordered by Great Highway to the

west and Sloat Blvd to the north. It was eliminated from analysis because the site had been approved to house the zoo's mammal conservation center and an avian conservation center and, therefore, would be an incompatible land use and would preclude future recreational use.

- **Vacant lot on Sloat Boulevard.** Since it was smaller than 3 acres, this site, located at 2900 Sloat Boulevard, had space constraints. In addition, land use in the area is primarily residential with light commercial intermixed along Sloat Boulevard, and there was a planned residential development for 16 buildings and 33 dwellings underway at the time, which has since constructed.

ALTERNATIVES Table 7. Alternative Sites Considered in the San Francisco Energy Company (SFEC) FSA (94-AFC-1)

Alternatives	Qualify ?	If Not, Why Not?
Innes Avenue	No	No environmental benefit (proximity of residences)
City Asphalt Plant	No	Too small for 540 MW
SF Thermal Plant	No	Too small for 540 MW
Hunters Point Power Plant	No	No environmental benefit
China Basin Stadium Site	No	Unavailable due to Mission Bay development underway
Mission Bay Development	No	Unavailable due to Mission Bay development underway
Rail Yard South of China Basin	No	Unavailable due to Mission Bay development underway
Cow Palace, Daly City	No	No environmental benefit (residential developments now surround available land)
Treasure Island	No	Inadequate infrastructure (transmission lines, natural gas) and geotechnical concerns related to building on fill
Hunters Point Naval Shipyard	No	Development plans underway for residential and other uses
PG&E's Martin Substation, Daly City	No	Inadequate land available
Tuntex Site	Yes	Considered herein as the Brisbane Alternative
Potrero Site	Yes	Considered herein as the Potrero Unit 7 Project alternative.
SF Airport Site	Yes	Considered herein as the SFIA Alternative
Catellus/Port Authority Site	No	Similar to site of proposed SFERP, but no environmental benefit (land use conflicts and regulatory feasibility issues)
Oceanside Water Pollution Control Plant	No	Incompatible land use with the SF Zoo and would preclude future recreational use

TRANSMISSION ALTERNATIVES

Two transmission alternatives (San Mateo-Martin and several similar East Bay to SF options) were considered in the San Francisco Long-Term Electric Transmission Planning Technical Study, October 24, 2000 (the study that ultimately recommended the

Jefferson-Martin Project). These same alternatives are also being considered in the San Francisco Peninsula Long-Term Transmission Planning Study, Phase 2 Study Plan, Version 3.0 (April 1, 2004). The other two projects (Jefferson-Martin and the Trans Bay Cable) are addressed elsewhere in this Staff Assessment, so are only briefly summarized here.

Jefferson-Martin 230 kV Transmission Project. This transmission alternative could be considered to be an alternative to the SFERP. It is included in the Revised San Francisco Action Plan (see **ALTERNATIVES Table 5**) as one of the nine necessary projects to release HPPP Units 1 & 4 from their RMR Agreements, but it would *not* release Potrero Unit 3 from its RMR Agreement, which is a major objective of the proposed SFERP (Edwards 2004a and 2004b). This project was approved by the CPUC on August 19, 2004. Construction is currently underway and the line should be operational by summer 2006. This project does in part meet the objectives of the SFERP: it will improve the City of San Francisco's electricity reliability; it will help to facilitate the shutdown of HPPP, and it creates no local impacts from electrical generation. However, given that this project has already been approved, it is considered in this analysis as part of the No Project Alternative.

Trans Bay Cable Project. This project would result in installation of a DC cable from Pittsburg (Contra Costa County) to the Potrero Substation. It is fully evaluated as an alternative to the SFERP (see Appendix A, Alternatives Evaluated in Detail).

San Mateo Substation to Martin Substation

Alternative Description

This alternative would consist of a new 14.3-mile 230 kV underground cable constructed between San Mateo and Martin Substations in the Cities of San Mateo, Burlingame, Millbrae, San Bruno, South San Francisco, and Brisbane. The routing of this alternative as suggested in the CA ISO Study would be in the same ROW as the existing underground 230 kV transmission line between San Mateo and Martin Substations.

This alternative would require internal transmission reinforcement and reactive support. Martin Substation is an outdoor 230/115kV transmission substation that has property available for substation facilities expansion.

The alternative would follow the existing 230 kV underground route, departing northward out of San Mateo Substation and heading across the Coyote Point Recreation Area (across the golf course) to the Highway 101 corridor. The route would roughly parallel Highway 101 along Airport Boulevard/Old Bayshore Highway. From the corner of Millbrae Avenue and El Camino Real (State Highway 82), the route heads north in El Camino Real for 1.3 miles. From this intersection to the north, El Camino Real is a major commercial roadway with at least 4 lanes and generally with a center median. The route tums east for two blocks just south of Santa Maria Avenue, and then tums north into San Antonio/Huntington Avenues (the BART ROW) for approximately 1.3 miles. Land uses along Huntington are residential and light industrial.

Immediately south of I-380, this route would turn east, cross under the freeway, and turn immediately north in Herman Street, which is a wide roadway with a railroad corridor to

the east and residential land uses to the west. After 0.6 miles in Herman Street, the route turns into Linden Avenue for 0.9 miles, traveling into central South San Francisco. Linden Avenue is fairly wide with mostly industrial and commercial enterprises along the roadway and some residences around Village Avenue. On Linden, the route would have to be bored below a railroad crossing (at Railroad Avenue) and a canal, crossing Linden at Canal Street. The route turns east on Baden Avenue for one block, then north into Bayshore Boulevard.

The alternative route would follow the existing 230 kV underground line in Bayshore Boulevard for 4.0 miles, around the east side of San Bruno Mountain to the east to Martin Substation. Bayshore Boulevard is mostly light industrial with several scattered residences west of the road around San Bruno Mountain. There is ongoing construction along Bayshore at the South San Francisco Highway 101 off-ramp that constricts Bayshore to a single lane, but aside from that temporary construction, Bayshore Boulevard is generally wide and well used (CPUC 2003).

Rationale for Elimination

Currently the San Mateo Substation is essentially the only source of externally generated power to the CCSF and northern San Mateo County. With this alternative, if there were a loss of 230 kV power at the San Mateo Substation, the CCSF would lose nearly all of its ability to import power.

The major feasibility concern related to this alternative is availability of adequate space within the city streets, given that the existing 230 kV transmission line is already located there and there are also other underground utilities. The proposed new underground transmission line would need to be separated from PG&E's existing underground line by at least 10 feet (preferably 15 feet) in order to prevent the heat generated by each line from affecting the transmission capacity of the other line. There would also be concerns about physically damaging the other utilities during construction. A buffer of at least five feet between the proposed trench and the nearest other utility would be necessary (CPUC 2003).

According to City of San Bruno, Huntington Avenue in the area of the PG&E's existing 230 kV line is one of the area's most tightly packed utility corridors. Utilities in this portion of Huntington Avenue include a 23-inch storm drain, a 16-inch gas pipe, a water line, and a sewer line. These utilities are primarily on the west side of Huntington Boulevard. In addition, there are many other utilities that perpendicularly cross Huntington Avenue. There would be space constraint issues with the addition of another 230 kV line within the road, but it would be feasible. However, there are major space constraints in Linden Avenue and Bayshore/Airport Boulevard through the City of South San Francisco (CPUC 2003).

Moraga or Sobrante Substation to Potrero Substation

Alternative Description

An approximately 20-mile kV circuit would be constructed connecting the Moraga and Potrero Substations. The route would utilize an existing transmission corridor from Moraga Substation to Claremont Substation and would then for the most part utilize a

common corridor from the Claremont Substation, through Oakland, to the east side of the San Francisco Bay. Initiating from Moraga Substation in the City of Orinda in Contra Costa County the line would travel northwest for approximately 1.3 miles before crossing Brookside Road and turning west.

The Sobrante Substation is located east of Bear Creek Road and south of the Briones Dam in the City of Orinda in Contra Costa County, about 4.6 miles north-northwest of the Moraga Substation. The line would travel south from the Sobrante Substation for approximately 3.3 miles and would join the Moraga line just north of Brookside Road in the City of Orinda. From that point the route would turn west and would be identical to the Moraga alternatives mentioned above.

From their joining point, the overhead line would continue in unincorporated Contra Costa County, Robert Sibley Volcanic Regional Preserve, part of the East Bay Regional Park District (EBRPD), and the City of Oakland in Alameda County where it would transition underground at Claremont Substation. From Claremont Substation, the underground line would continue through urbanized areas in the City of Oakland to the eastern edge of the San Francisco Bay.

There are four options for bringing the transmission line across the San Francisco Bay: (a) run the cable through the BART service tunnel (between the two tunnels for the eastbound and westbound trains); (b) hang the cables from the Bay Bridge (new bridge in east half; existing bridge in west half); (c) lay a new submarine cable; or (d) use a combination of hanging on the Bay Bridge and a submarine cable.

Within the CCSF after the Bay crossing, assuming a landing south of I-80, the route could travel south along The Embarcadero, turn west onto King Street, then southwest onto 3rd Street where it would pass through the Mission Bay development. The route would turn south onto Illinois Street and follow it to the Potrero Substation at the corner of 23rd Street Land use along the transmission line route within the CCSF would be primarily industrial and commercial.

The use of HVDC Light™ technology[7] for the Moraga to Potrero route (330 MW or 540 MW) has been informally proposed by Sea Breeze Pacific Regional Transmission System, Inc. and the concept is in the beginning stages of discussion at the CAISO San Francisco Stakeholders Study Group as of July 26, 2005. The Sea Breeze proponents have requested that the CAISO delay approval of the Trans Bay Cable to allow consideration of this competing project. However, it is too early in the planning stages for the Sea Breeze project to be considered as a viable alternative for SFERP within the project timeframe.

Rationale for Elimination

Any cross-bay transmission alternative originating at the Moraga or Sobrante Substations would require construction of 4.7 miles of overhead transmission line through the City of Orinda and East Bay Hills (open space east of Oakland where a

[7] HVDC Light™ was developed by ABB Power Technologies AB as a transmission technology based on voltage source converters (VSCs) and insulated gate bipolar transistors (IGBTs) linked together by underground/undersea cables. HVDC Light™ can operate at low short circuit power levels thereby extending the economical power range of HVDC transmission down to just a few MW. It also improves the stability and reactive power control at each end of the network and connects more easily into the AC system than the Conventional HVDC. Although HVDC Light™ was originally developed in 1997, it has only been within the past year that the technology has been developed for capacities over 330 MW (for more information on HVDC Light™, see http://www.abb.com/hvdc).

wide range of wildlife species and special status plants would be affected). The route would pass through Robert Sibley Volcanic Regional Preserve, one of the EBRPD's original parks, for approximately 0.9 miles. Sibley Volcanic Preserve's main entrance is on Skyline Boulevard just east of the intersection with Grizzly Peak Boulevard in the Oakland hills.

Round Top, a peak within Sibley preserve approximately 0.5 miles south of the transmission line route is one of the highest peaks in the Oakland hills and provides an unsurpassed outdoor laboratory for the study of volcanism in the Central Coast Ranges. Volcanic dikes, mudflows, lava flows, and other evidence of the extinct volcanoes are visible throughout the park's 660 acres. There are also vistas of Mt. Diablo and the hills of Las Trampas, and beautiful displays of wildflowers in season. This alternative would pass through the park, widening the existing ROW, which already contains three transmission lines so incremental additional impacts would be created. The route would also cross a Bay Area Ridge Trail within the EBRPD. Large towers and transmission lines could biologically, geologically, recreationally, and visually affect this important preserve area. There may be public concerns about upgrading the existing 115 kV corridor to a 230 kV corridor, especially regarding EMF.

One segment of the overhead line would pass adjacent to residences: on Broadway Terrace in the City of Oakland for approximately 0.2 miles. The line would transition to underground at PG&E's existing Claremont Substation. South of the Claremont Substation, there would be an additional 9.2 miles of underground construction in Oakland, passing through industrial, commercial, and some residential areas. The underground construction through Oakland would have very similar types of impacts to those of the SFERP's short underground transmission line segment. However, approximately 8.6 miles of the Oakland underground route are through industrial and commercial land uses, with approximately 0.6 miles in residential areas on Peralta Street, Claremont Avenue, and Forest Street.

While there are several options for crossing the Bay, the specific technology of the bay crossing has not been defined. There would be marine impacts resulting from installation of a submarine cable. There is also reliability risk to submarine cables from ship anchors and dredging activities, so the line would have to be buried well below dredging depths. Beyond navigation and dredging concerns of the USACE, there would be biological concerns with construction impacts to essential fish habitat. Most of the route of the proposed transmission line is in an area that is regularly disturbed by dredging so marine impacts in that area are not of major concern, but at both the east and west Bay margins, there could be significant biological effects, especially in areas of eel grass. There could also be cultural resources issues associated with shipwrecks and the closer proximity to the Bay increases chance of significant resources. Use of the BART tunnel for a bay crossing would not affect the resources of the San Francisco Bay.

A submarine crossing of the bay would require a permit from the BCDC for compliance with the McAteer-Petris Act and the San Francisco Bay Plan. This permit could be granted only if upland alternatives were not available, so as an alternative to a power plant, BCDC permitting may not be attainable.

In order for the Bay Bridge to be used to support a transmission line, the crossing would require that Caltrans grant an exception to its policy prohibiting longitudinal encroachment within its rights-of way, which is very unlikely. The timeline and coordination with the Bay Bridge Retrofit Project could also conflict with this project. If the transmission line is placed on the existing bridge now, there will be problems when the eastern span replacement project (now under construction) is completed in the future.

The BART tunnel Bay-crossing option would also be considered infeasible due to limited space available in the BART service tunnel, heat generation by the 230 kV cables, and BART worker safety concerns.

RENEWABLE RESOURCE ALTERNATIVES

Aggressive efforts are now being made to increase the renewable resource component of California's generation supply. In the year 2002, California had over 7,000 MW of renewable energy capacity, including solid-fuel biomass, geothermal, wind, small hydroelectric (30 MW or less), concentrating solar power (CSP), photovoltaic systems (PV), landfill gas, digester gas, and municipal solid waste (MSW) facilities (CEC 2003b). These facilities produced about 28,900 GWh in 2002, about 11 percent of the electricity used in California (CEC 2003b). This section considers the principal renewable electricity generation technologies that could serve as alternatives to the SFERP. These technologies are wind, solar, tidal, wave, geothermal, and biomass energy. The technologies are attractive from an environmental perspective because of the absence or reduced level of air pollutant emissions. However, these technologies also have environmental consequences, feasibility problems, and they may not meet the objectives of the SFERP.

Renewable Portfolio Standard Program. The Energy Commission, in collaboration with the California Public Utilities Commission (CPUC), has initiated a proceeding to implement the State's Renewable Portfolio Standard Program as mandated by Senate Bill 1078 (SB 1078, Sher, Chapter 516, Statutes of 2002) under Public Utilities Code sections 381, 383.5, 399.11 through 399.15, and 445. California's Renewable Portfolio Standard (RPS) requires retail sellers of electricity to increase their procurement of eligible renewable energy resources by at least 1 percent per year so that 20 percent of their retail sales are procured from eligible renewable energy resources by 2017. The RPS legislation requires that the CPUC and Energy Commission work collaboratively to implement the RPS and assigns specific roles to each agency. Pursuant to SB 1078, the Energy Commission's responsibilities include:

- Certifying eligible renewable resources that meet criteria contained in the bill, including those generating out-of-state
- Designing and implementing a tracking and verification system to ensure that renewable energy output is counted only once for the purpose of the RPS and for verifying retail product claims in California or other states
- Allocating and awarding supplemental energy payments as specified in SB 1038 to eligible renewable energy resources to cover above-market costs of renewable energy.

As a part of this process, the Energy Commission formally adopted *Renewable Portfolio Standard Guidelines* on February 19, 2003, pursuant to Public Utilities Code section

383.5, subdivision (h), and subsequently revised pursuant to this authority and Public Resources Code section 25747 (a) on April 21, 2004, and May 19, 2004. These *Guidelines* were adopted to govern the Renewable Energy Program and its various program elements under SB 1038 and SB 1078, to assist interested applicants in applying for Program funds and RPS certification, and for verifying RPS compliance. The *Guidelines* are divided into six separate documents including:

- Overall Program Guidebook
- Existing Renewable Facilities Program Guidebook
- Emerging Renewable Program Guidebook
- Renewable Resource Consumer Education Guidebook
- New Renewable Facilities Program Guidebook
- Renewables Portfolio Standard Eligibility Guidebook

The CPUC is addressing its responsibilities in implementing the RPS through a separate proceeding titled, Order Instituting Rulemaking to Establish Policies and Cost Recovery Mechanisms for Generation Procurement and Renewable Resource Development (R. 01-10-24). The CPUC's responsibilities include:

- Establishing a process to determine market price referents, setting the criteria for IOU ranking of renewable bids by least cost and best fit, and establishing flexible compliance rules, penalty mechanisms and standard contract terms and conditions
- Establishing initial renewable generation baselines for each IOU, making subsequent changes to these baselines as needed, and determining annual procurement targets
- Directing the IOUs to develop procurement plans, and approving, amending or rejecting the plans
- Making specific determinations of market price referents for products under contract
- Approving or rejecting IOU requests to enter specific contracts for renewable power, including determining if a solicitation was adequately competitive
- Factoring transmission and imbalance costs into the RPS process and identifying the transmission grid implications of renewable development
- Defining rules for the participation of renewable Distributed Generation (DG), Electric Service Providers (ESP), Community Choice Aggregators (CCA), and potential Procurement Entities.

The CPUC and the Energy Commission have developed a schedule for addressing RPS issues, and have established guidelines for how the two agencies work collaboratively on the RPS. The schedule and collaborative process are described in the Energy Commission's Committee Order on RPS Proceeding and CPUC's Collaborative Guidelines. The Order also describes administrative procedures for interested parties who wish to participate in the Energy Commission's RPS proceeding.

San Francisco Electricity Resource Plan. The Electricity Resource Plan, a joint effort by the SFPUC and San Francisco's Department of the Environment, proposes a plan to avoid future energy crises through energy efficiency, new cleaner generation and imported power, and provides a framework for shifting San Francisco's dependence on

fossil-fuel burning power plants to clean, renewable forms of energy. The Board of Supervisors in the May 2001 "Maxwell Ordinance" entitled "Human Health and Environmental Protections for New Electric Generation" directed the agencies to produce the Plan. Mayor Willie Brown signed the Plan in December 2002 (SF Environment 2002).

The purpose of the Plan is to show how CCSF can meet its future electricity by building cleaner in-City generation, implementing aggressive energy efficiency and peak load management, as well as supporting completion of planned transmission upgrades. At the same time, the Plan assumes that PG&E's Hunters Point Power Plant and Mirant's Potrero Power Plant Unit 3 can be shut down, and that CCSF will require no new large-scale central electricity generation.

Before drafting the Plan, SF Environment and SFPUC held numerous public meetings in neighborhoods across CCSF to identify resident and business community priorities. Major concerns include reliability, efficiency, affordability, and the reduction of harmful emissions associated with the production of electricity. In answer to these concerns, the plan provides a means to shut down Hunters Point Power Plant, and reduce operation at the existing plant on Potrero Hill by releasing them from their RMR Agreements with the CA ISO. This will be accomplished by developing sufficient replacement power through a combination of aggressive energy efficiency and conservation programs, and by building new renewable and cleaner, smaller scale fossil fuel generation.

Some of the renewable projects proposed in the Plan included a football field-sized solar photovoltaic system at the new Moscone Center (operational since March 2004), and a second solar installation planned for the SEWPCP. The Plan also addresses the potential for wind turbines to be placed outside CCSF in the Altamont Pass, and tidal current and wave generation could be developed in cooperation with other municipalities at various locations in the Bay. Other proposed municipal sites for development of renewable power projects include the airport and the port.

CCSF also has a 2 MW cogeneration plant at the SEWPCP that uses waste gas from the plant to process heat and produce energy. The plant is currently inactive because a new gas clean-up system needs to be installed before the plant can reopen (Doyle 2005).

Wind Technology

Alternative Description

Wind carries kinetic energy that can be utilized to spin the blades of a wind turbine rotor and an electrical generator, which then feeds alternating current (AC) into the utility grid. Most state-of-the-art wind turbines operating today convert 35 to 40 percent of the wind's kinetic energy into electricity. A single 1.5 MW turbine operating at a 40 percent capacity factor generates 2,100 MWh annually. Modern wind turbines represent viable alternatives to large bulk power fossil power plants as well as small-scale distributed systems. Wind turbines being manufactured now have power ratings ranging from 250 watts to 1.8 MW, and units larger than 4 MW in capacity are now under development (AWEA 2004). The average capacity of wind turbines today is 750 kW (CEC 2004 - Comparative Study of Transmission Alternatives, Background Report).

California was the first U.S. state in which large wind farms were developed, beginning in the early 1980's, and the state still leads the nation in wind power generation. However, 16 other states are considered to have greater overall wind generation potential. California currently has an installed capacity of 2,051 MW, and an additional over 300 MW are planned (AWEA 2004).

The perception of wind as an emerging energy source reached a peak in the early 1980s, when wind turbine generators to convert wind power into electricity were being installed in California at a rate of nearly 2,000 per year. Progress slowed a few years later, however, as startup tax subsidies disappeared and experience demonstrated some deficiencies in design. At the present time, technological progress again has caught up, contributing lower cost, greater reliability, and reason for genuine optimism for the future (Lamarre, 1992). A major factor has been the inclusion of environmental externalities by electric utilities in their resource planning programs. The more penetrating analysis, which has included these potential costs, has shown wind power to be substantially more economically attractive than was previously thought.

The technology is now well developed, and can be used to generate significant amounts of relatively low-cost power.

Wind turbines can create other environmental impacts, as summarized below (AWEA 2004):

- Erosion can be a concern in certain habitats such as the desert or on mountain ridgelines. Standard engineering practices can be used to reduce erosion potential.
- Birds collide with wind turbines. Avian deaths have become a concern at Altamont Pass in California, which is an area of extensive wind development and also high year-round raptor use.
- Wind energy can negatively impact birds and other wildlife by fragmenting habitat, both through installation and operation of wind turbines themselves and through the roads and power lines that may be needed.
- Bat collisions at wind plants generally tend to be low in number and to involve common species, which are quite numerous. A high number of bat kills at a new wind plant in West Virginia in the fall of 2003 has raised concerns, and the problem of bat mortality at that site is currently under investigation.
- Visual impacts of wind power fields can be significant, and installation in scenic and high traffic areas often results in strong local opposition.
- Noise was an issue with some early wind turbine designs, but it has been largely eliminated as a problem through improved engineering and through appropriate use of setbacks from nearby residences. Aerodynamic noise has been reduced by changing the thickness of the blades' trailing edges and by making machines "upwind" rather than "downwind" so that the wind hits the rotor blades first, then the tower (on downwind designs where the wind hits the tower first, its "shadow" can cause a thumping noise each time a blade passes behind the tower). A small amount of noise is generated by the mechanical components of the turbine.

In open, flat terrain, a utility-scale wind plant would require about 60 acres per MW of installed capacity. However, only 5 percent (3 acres) or less of this area would actually be occupied by turbines, access roads, and other equipment. The remainder could be used for other compatible uses such as farming or ranching. A wind plant located on a ridgeline in hilly terrain will require much less space, as little as two acres per MW (AWEA 2004).

Rationale for Elimination

The large area needed for wind electricity generation would create significant land use, biological, cultural, and visual concerns. In addition, wind turbines would have noise impacts associated with both construction and operation. Wind turbines have been documented to kill large numbers of raptors because these fast-flying birds do not account for movement of the rotating blades.

In addition, there are reliability concerns with wind technology because of the need for a consistent wind source. Extensive wind generation would also require additional transmission to serve areas of high demand. The extensive land required to generate enough electricity to meet demand is not available in the project area.

Wind generation is possible in other locations throughout California. San Francisco could possibly obtain significant amounts of wind power in areas such as the Altamont Pass, where wind speeds are high and other conditions like proximity to transmission can be met. As a result of the Energy Plan, CCSF is currently looking at several sites including those adjacent to its own Bay Area reservoirs. However, because generation is not feasible locally, any power generated would require substantial transmission to import the power to CCSF, which would create greater environmental impacts over a larger area.

Wind technology has the advantage of not requiring the burning of fossil fuels and the resulting environmental and resource impacts associated with natural gas fired power. However, wind has the potential to cause significant land use, biological, cultural resources, and visual impacts.

Solar Technology

Alternative Description

Electricity generation from solar technologies, including both photovoltaic and solar thermal systems, currently totals about 0.3 percent of the state's electricity production (CEC 2004 - Comparative Study of Transmission Alternatives, Background Report). Maximum power output of PV systems closely matches California's peak electrical demands. Currently, there are two types of solar generation available: solar thermal power and photovoltaic (PV) power generation.

Solar thermal power generation uses high temperature solar collectors to convert the sun's radiation into heat energy, which is then used to run steam power systems. Solar thermal is suitable for distributed or centralized generation, but requires far more land than conventional natural gas power plants. Solar parabolic trough systems, for instance, use approximately five acres to generate one megawatt. Although significant improvements have been made in technology advances and cost reductions, additional

research and development is needed for concentrating solar power to be cost-competitive with conventional fossil fuel plants. Solar thermal facilities will likely not come into play until the 2008-2017 timeframe (CEC 2003a).

Photovoltaic (PV) power generation uses special semiconductor panels to directly convert sunlight into electricity. Arrays built from the panels can be mounted on the ground or on buildings, where they can also serve as roofing material. Unless PV systems are constructed as integral parts of buildings, the most efficient PV systems require about four acres of ground area per megawatt of generation.

PV power systems require approximately one acre per 250 kW at 50 percent area coverage and 10 percent system efficiency. Systems up to about 250 kW are often placed on buildings, and are commonly referred to as building-integrated PV or dual use systems. For systems larger than 250 kW, ground-mount installations are more common. Ground-mount sites require environmental impact reviews because in order to achieve power levels comparable to conventional fossil-fueled peaking combustion plants, large areas are required. For a 50 MW system, over 200 acres would be required. This could be achieved as a single system or as a number of smaller systems distributed on building roofs, covered parking structures, or similar "community integrated" deployments (CEC 2004 - Comparative Study of Transmission Alternatives, Background Report).

The use of solar energy in California offers obvious promise as an environmentally preferred resource. However, it is limited by its availability (only during daytime hours) and by the relatively high cost of solar panels. Clouds, fog and shading limit the amount of power that a system produces. The intermittent nature of the power, however, makes PV systems unsuitable for base-load applications. Solar is, however, particularly valuable when used at the local level to reduce peak power usage and to defer distribution infrastructure development.

San Francisco Electricity Resource Plan. This planning effort provides a local example of an aggressive solar energy program. In an effort to address the CCSF electricity issues, the San Francisco Electricity Resource Plan was adopted by the Board of Supervisors and signed by Mayor Willie Brown in December 2002 as a policy guide to be used in proposing and implementing specific actions related to providing electricity to San Francisco. Those actions that require the expenditure of CCSF funds or require compliance with environmental laws will likely require additional analysis and public review. This Plan provides a long-term vision of the CCSF's possible electricity future. Because the Plan extends over a ten-year time horizon, it may need to be adapted and revised to accommodate changing circumstances.

The CCSF in November of 2001 passed a proposition that would provide $100 million to support solar power and other renewable programs. In addition and discussed earlier, CCSF has prepared an Energy Resource Plan (in accordance with the Maxwell Ordinance[8]) to guide the various energy efforts underway in the City. These programs will result in increased solar (or other renewable) generation within the CCSF. The City has not yet determined the amount of power that might be generated with the $100

[8] The Maxwell Ordinance, also titled "Human Health and Environmental Protections for New Electric Generation" was passed by the SF Board of Supervisors in May 2001 and directed the City to prepare the Electricity Resource Plan, setting forth the means by which the City would reduce its reliance on in-City fossil fuel generation (CCSF, 2002).

million investment, nor do they know how long it will take to invest the $100 million in order to fully implement the program.

CCSF's first large solar power development was at the City's convention center, Moscone Center. With approximately 60,000 square feet of perfectly flat unshaded roof, this football-field sized showpiece has significantly reduced Moscone's purchase of power and provides a solar showplace for visitors from all over the world. The Moscone solar installation generates 674 kW of electricity (SF Visitor 2004). Through the Mayor's Energy Conservation Account (MECA) funding, other current solar projects in development in CCSF include the following sites: Moscone West (300 kW), NorCal Pier 96 (255 kW), Northpoint Water Pollution Control Plant (300 kW), SEWPCP (255 kW), San Francisco General Hospital (500 kW), San Francisco International Airport (500 kW), and at the SFPUC Water Department (500 kW). In addition, 10 other sites (6 schools, 2 public health facilities, and 2 libraries) for a total of 45 kW are in the bidding process as of July 2005 (Doyle 2005).

The SFPUC has also installed radiometers at eleven sites on City buildings and schools to collect data about the availability of sunlight. The variability in solar incidence is based on microclimate and geography, and when cross-referenced with availability of appropriate space, limits the application of solar technologies in some areas of CCSF. To develop a well thought-out strategy of implementation, CCSF needs to understand the resource and develop it where it is most cost effective. If sufficient participation by commercial and residential customers is obtained, 50 MW of solar could be installed in San Francisco. Price of systems is a major consideration in achieving this magnitude of installation. A sustained program to develop solar in San Francisco can help reduce the overall cost of solar technologies.

Rationale for Elimination

Solar generation facilities are attractive because they do not generate air emissions and have relatively low water requirements. However, there are other potential impacts associated with their use. Construction of solar thermal plants can lead to habitat destruction and visual impacts. PV systems can also have negative visual impacts, especially if ground-mounted. Furthermore, PV installations are highly capital intensive and manufacturing of the panels generates some hazardous wastes.

There are reliability concerns with the technology and the need for a consistent solar source. Both solar thermal and PV facilities generate power during peak usage periods since they collect the sun's radiation during daylight hours. However, solar energy technologies cannot provide full-time availability due to the natural intermittent availability of solar resources. Extensive solar generation would also require additional transmission to serve areas of high demand. Therefore, solar generation technology would not meet the project's goal, which is to provide immediate power to meet peaks in demand. The extensive land required to generate electricity entirely from solar sources is not available in San Francisco and transmission would still be required to transport the power in from other areas.

As demonstrated by the Moscone Center 674 kW and $4.2 million project, solar photovoltaics are technically feasible and California clearly has a climate where this technology would be useful (Vote Solar 2005). However, the cost of these systems

currently prohibits their widespread use. Solar generation is a feasible technology on a small scale, but it cannot reliably generate 145 MW of power, as required for the SFERP Project.

Given the project objective of providing reliable electric power to the CCSF in the near term, this technology is not considered to be a feasible project alternative. Therefore, this alternative was eliminated from further consideration.

Tidal Technology

Alternative Description

The San Francisco Board of Supervisors approved a resolution on May 6, 2003 for a pilot project to explore using tides to make electricity. The board asked CCSF's Department of the Environment to head the project. The project, approved unanimously by the City's Board of Supervisors, is part of San Francisco's efforts to pursue nonpolluting energy (see above description of the Energy Resource Plan). The pilot project in San Francisco would be the first working project in the United States to test tidal power. This effort stems from California's recent energy shortages and the City's plan to decommission HPPP.

The initial project goal was to create one megawatt of renewable tidal energy, but the project has been scaled back to 150 kW. The details to be worked out are funding, which has lead to project delays, and where along the bay or ocean shoreline the power project should be built. The supervisors also asked Marin County and the cities of Richmond and Vallejo to participate in a regional task force that will look at creating other tidal energy projects in the Bay Area.

Each day, nearly 400 billion gallons of water pass through the mouth of San Francisco Bay under the Golden Gate Bridge, which has been estimated by IEEE Power Engineering Society to be enough to generate an estimated 2,500 MW (more than twice the City's peak power demand) with a conservative 3-knot average tidal current (IEEE 2005). If harnessed, the energy from this water could be an answer to the CCSF's power needs (Llanos 2003). The system would not impact shipping since it would be far below the surface, probably on the sea floor itself. The cost of building a 1,000 MW system is estimated at $600 million, but San Francisco's Environment Department estimates that over 30 years, costs would average out to 6 cents per kilowatt-hour—about the same as natural gas and less than what San Franciscans now pay for power (Llanos 2003). Within 10 years, San Francisco could build enough clean tidal power to meet its daily energy needs, as well as generate surplus energy to sell—all with a price tag of about one-third the cost per megawatt of solar power.

A major drawback of tidal power stations is that they can only generate when the tide is flowing in or out. However, unlike the sun and wind, tidal current is consistent and predictable, so regulators can plan to have other power stations generating at those times when the tidal station is out of action. Overall, tidal generators could produce electricity up to 16 hours a day.

Background

The oldest technology to harness tidal power for the generation of electricity involves building a dam, known as a barrage, across a bay or estuary that has large differences in elevation between high and low tides. Water retained behind a dam at high tide generates a power head sufficient to generate electricity as the tide ebbs and water released from within the dam turns conventional turbines.

Certain coastal regions experience higher tides than others. This is a result of the amplification of tides caused by local geographical features such as bays and inlets. In order to produce practical amounts of power for tidal barrages, a difference between high and low tides of at least five meters is required. There are about 40 sites around the world with this magnitude of tidal range. In Canada, the only practical site for exploiting tidal energy is the Bay of Fundy between New Brunswick and Nova Scotia. The higher the tides, the more electricity can be generated from a given site, and the lower the cost of electricity produced. Worldwide, approximately 3,000 GW of energy is continuously available from the action of tides. Due to the locational constraints, it has been estimated that only 2 percent or 60 GW can potentially be recovered for electricity generation (Baird 1993).

Currently, although the technology required to harness tidal energy is well established, tidal power is expensive, and there is only one major tidal generating station in operation. This is a 240-MW station at the mouth of the La Rance river estuary on the northern coast of France near St. Malo. The La Rance generating station has been in operation since 1966 and has been a very reliable source of electricity for France. La Rance was supposed to be one of many tidal power plants in France, until their nuclear program was greatly expanded in the late 1960's. Elsewhere there is a 20 MW experimental facility at Annapolis Royal in Nova Scotia built in 1984. The smallest tidal plant is located at Kislaya Guba on the White Sea in Russia. It has a 0.5 MW capacity. There are approximately 10 small barrages scattered throughout the world, but they are not intended for commercial power generation. For example, there is a 200-kW tidal barrage on the River Tawe in Swansea Bay, Wales that operates the gates of a lock. China has several tidal barrages of 400 kW or less in size.

Numerous studies have been conducted for large-scale tidal barrages in a variety of locations, but the biggest proposal was for the 8,640-MW Severn Tidal Barrage (STB). A broad range of studies was conducted from 1974 to 1987 on this proposal to dam the Severn Estuary between Wales and England. It has been estimated that the barrage across the Severn River in western England could supply as much as 10 to 12 percent of the country's electricity needs (12 GW). The proposal was shelved in 1987 due to "economic problems," but the proposal would have likely met with fierce opposition from an array of environmental groups and local residents. Similarly, several sites in the Bay of Fundy, Cook Inlet in Alaska, and the White Sea in Russia have been found to have the potential to generate large amounts of electricity.

Despite the success of La Rance, no other major tidal barrages have been built since, due in some part to environmental concerns. Barrages present a barrier to navigation by boats and fish alike; reduced tidal range (difference between high and low water levels) can destroy much of the inter-tidal habitat used by wading birds; and sediment trapped behind the barrage could also reduce the volume of the estuary over time. By

the early 1990s, interest in estuarine-derived tidal power had largely ceased, and scientists and engineers began to look at the potential of tidally-generated coastal currents instead.

As tides ebb and flow, currents are often generated in coastal waters (quite often in areas far-removed from bays and estuaries). In many places the shape of the seabed forces water to flow through narrow channels, or around headlands (much like the wind howls through narrow valleys and around hills). However, seawater has a much higher density than air, meaning that currents of 5 to 8 knots generate as much energy as winds of much higher velocity. In addition, unlike the wind rushing through a valley or over hilltops, tidally-generated coastal currents are predictable. The tide comes in and out every twelve hours, resulting in currents which reach peak velocity four times every day. Two rival technologies -- tidal fences and tidal turbines -- are now being developed to catch the energy of these currents.

Coastal currents are strongest at the margins of the world's larger oceans. A review of likely tidal power sites in the late 1980s estimated the energy resource was in excess of 330,000 MW. South East Asia is one area where it is likely such currents could be exploited for energy. In particular, the Chinese and Japanese coasts, and the large number of straits between the islands of the Philippines are suitable for development of power generation from coastal currents.

Tidal Fences. Tidal fences are effectively barrages, which completely block a channel. As discussed above, if deployed across the mouth of an estuary they can be very environmentally destructive. However, in the 1990s their deployment in channels between small islands or in straights between the mainland and island has increasingly been considered as a viable option for generation of large amounts of electricity.

The advantage of a tidal fence is that all the electrical equipment (generators and transformers) can be kept high above the water. Also, by decreasing the cross-section of the channel, current velocity through the turbines is significantly increased.

The first large-scale commercial fences are likely to be built in South East Asia. The most advanced plan is for a scheme for a fence across the Dalupiri Passage between the islands of Dalupiri and Samar in the Philippines, agreed between the Philippines Government and Energy Engineering Company of Vancouver, Canada in late 1997. The site, on the south side of the San Bernardino Strait, is approx. 41 m deep (with a relatively flat bottom) and has a peak tidal current of about 8 knots. As a result, the fence is expected to generate up to 2,200 MW of peak power (with a base daily average of 1,100 MW) (Osborne 2000).

Tidal Turbines. Tidal turbines are the chief competition to the tidal fence and are what are being proposed for the San Francisco Pilot Project. Looking like an underwater wind turbine they offer a number of advantages over the tidal fence. They are less disruptive to wildlife, allow small boats to continue to use the area, and have much lower material requirements than the fence.

Tidal turbines function well where coastal currents run at 2 to 2.5 m/s (slower currents tend to be uneconomic while larger ones put a lot of stress on the equipment). Such

currents provide an energy density four times greater than air, meaning that a 15-meter diameter turbine will generate as much energy as a 60-meter diameter windmill. In addition, tidal currents are both predictable and reliable, a feature which gives them an advantage over both wind and solar systems. The tidal turbine also offers significant environmental advantages over wind and solar systems; the majority of the assembly is hidden below the waterline, and all cabling is along the seabed.

There are many sites around the world where tidal turbines could be effectively installed. The ideal site is close to shore (within 1 km) in water depths of about 20-30 meters. Peter Fraenkel, director of UK-based Marine Current Turbines, believes the best sites could generate more than 10 megawatts of energy per square kilometer. The European Union has already identified 106 sites which would be suitable for the turbines, 42 of them around the UK. Further afield, Fraenkel believes the Philippines, Indonesia, China and Japan could all develop underwater turbine farms (Osborne 2000).

Rationale for Elimination

There are reliability concerns with the technology because it is so new. San Francisco has been looking closely at technology developed by HydroVenturi Inc., which started in London and now has a San Francisco office. Expanding from a test to an underwater grid powering the entire city would take many years (beyond the timeframe of the Proposed Project) and would need to overcome environmental hurdles (see below).

There would be regulatory feasibility issues associated with permitting from the USACE, BCDC, and/or the California Coastal Commission (depending on the location) for the large underwater area required for tidal energy generation. This technology is also new, and it is not clear whether the technology is feasible.

In addition, extensive underwater acreage would be required to generate enough electricity to meet demand. Tidal technologies have the potential to cause significant biological impacts, especially to marine species and habitats. Fish could be caught in the unit's fins by the sudden drop in pressure near the unit. The passageways, more than 15 feet high and probably sitting on the bay floor, could squeeze out marine life that lives there or alter the tidal flow, sediment build-up, and the ecosystem in general. San Francisco's test project as well as environmental impact studies would be necessary to determine potential significant impacts. Also, depending on its location commercial shipping could be disrupted during construction.

In summary, tidal generation is not yet a feasible technology on the scale required to replace a 145 MW generation project in the San Francisco area. In addition, it has the potential to create significant impacts, which would result in potential regulatory infeasibility. Therefore, this alternative was eliminated from further consideration.

Wave Technology

Alternative Description

Wave power technologies have been around for nearly thirty years. Setbacks and a general lack of confidence have contributed to slow progress towards proven devices that would have a good probability of becoming commercial sources of electrical power.

The highest energy waves are concentrated off the western coasts in the 40° to 60° latitude range north and south. The power in the wave fronts varies in these areas between 30 and 70 kW/m with peaks to 100kW/m in the Atlantic southwest of Ireland, the Southern Ocean and off Cape Horn. The capability to supply electricity from this resource is such that, if harnessed appropriately, 10 percent of the current level of world supply could be provided (WEC 2001). Work is still needed to determine how much more may be captured by other products (such as pumped water for desalination or electrolysis), once the storage technology for hydrogen is suitably developed.

The total power of waves breaking on the world's coastlines is estimated at 2 to 3 million megawatts. In favorable locations, wave energy density can average 65 MW-per-mile of coastline. Three approaches to capturing wave energy are:

- **Floats or Pitching Devices.** These devices generate electricity from the bobbing or pitching action of a floating object. The object can be mounted to a floating raft or to a device fixed on the ocean floor.
- **Oscillating Water Columns (OWC).** These devices generate electricity from the wave-driven rise and fall of water in a cylindrical shaft. The rising and falling water column drives air into and out of the top of the shaft, powering an air-driven turbine.
- **Wave Surge or Focusing Devices.** These shoreline devices, also called "tapered channel" or "tapchan" systems, rely on a shore-mounted structure to channel and concentrate the waves, driving them into an elevated reservoir. Water flow out of this reservoir is used to generate electricity, using standard hydropower technologies.

An experimental wave project was run in summer 2004 by Ocean Power Delivery Ltd in the Scottish Orkneys, which successfully provided power to 500 homes through Scottish Power. Marine power research has received millions of dollars worth of government subsidies in Scotland, but the United States currently has no federal program.

In summer 2005, Verdant Power is scheduled to place six turbines on the bottom of New York City's East River to supply power to a food market on Roosevelt Island in the river, which separates Manhattan from the boroughs of Brooklyn and Queens. The company is seeking the go-ahead to install as many as 200 to 300 turbines in the East River. If expanded, the project could produce five to 10 MW of electricity at an initial cost of $20 million (Anderson and Gardner 2005).

The United States does not have any wave energy facilities to date, but many coastal communities have toyed with the notion. In fact, about 30 wave-energy ventures have been tried somewhere around the world in recent years--and most have foundered. Some systems have managed to move from drawing boards to the sea, where they are actually producing small amounts of power, including such projects as the Pelamis in Scotland and the Limpet in Ireland. But, generally speaking, wave energy technology has been unsuccessful. In most coastal areas, waves are intermittent, which means energy production is spotty. Virtually all of the devices tested in the past only produced electricity when the surf was up, with no means of storing power.

The devices typically produce what's known as low-frequency power, which can be difficult and expensive to convert to high-frequency electrical grids. Also, many of the devices are complicated and somewhat fragile, and do not stand up well to heavy surf.

And past wave technologies involved lots of electrical components, hydraulic fluids and oils, all presenting pollution risk.

Currently, the most ambitious project is planned for Humboldt's remote and battered coast, where a Minnesota energy-engineering company will introduce the Seadog, a pump that operates on wave motion. The Seadog, say its inventors, represents a different, simpler and more rugged approach that can actually turn an elusive dream into a commercial reality (Martin 2004).

Manufactured by Independent Natural Resources Inc. of Eden Prairie, MN, the device is an anchored mechanical pump that uses wave action to transport seawater to an elevated reservoir onshore. Water from the reservoir is then released down a flume to turn a turbine, which produces high-frequency electricity. Energy is stored latently, as water in the reservoir. When more electricity is needed, more water is released down the flume. The system involves no hydraulics, no noxious fluids, and no submerged cables.

Laboratory trials last year by the Offshore Technology Research Center at Texas A&M University showed the Seadog, in 26-inch surf, generated an operational pressure of 125 to 168 pounds per square inch, enough to push water almost 400 feet. That was within 95 to 98 percent of the performance figures cited by the company, and confirmed that the device could theoretically do what it was claimed to do.

Mark Thomas, the founder and president of Independent Natural Resources, said the Seadog evolved from a related energy production device that drove a motor by using the compressed air that is routinely fed into pipelines to move natural gas from one location to another. Bolstered by $270,000 in venture capital, Thomas plans to have a single unit installed off the Humboldt coast by the end of the year to demonstrate the essential feasibility of the technology in the real marine world. The project must be approved by the California Coastal Commission and the State Lands Commission.

If the pump isn't battered into flotsam by Humboldt's heavy surf, a 16-pump project will follow, hooked up to a 50,000- gallon tank to store seawater for the hydropower production. That would cost about $3 million and yield about 537 kilowatts, enough power to service about 600 homes.

A 200-pump, 6,700-kilowatt system would follow, powering more than 7,000 homes. According to the company's business plan, that would cost about $16 million to build and require about $1.6 million in annual maintenance and operational costs. Its electricity would cost about 31/2 cents a kilowatt-hour, which, generally speaking, is comparable to the cost of coal-generated electricity, cheaper than natural gas generation and more expensive than nuclear.

Ultimately, said Thomas, a 1-square-mile array could be built, generating about 750 MW, enough power for about 100,000 homes. If things ever get that far, such a plant would cost $217 million to construct, cost about $110 million a year to operate, and yield power priced at 2.08 cents a kilowatt-hour (Martin 2004).

CCSF co-hosted a conference on wave energy projects in September 2004 and is working on a demonstration project with Scotland's Ocean Power and the Palo Alto-

based Electric Power Research Institute (EPRI). The Scotland's Ocean Power Orkney project uses a floating steel cylindrical device, about the length of four train cars, with sections connected by hinged joints. Rolling waves move against the sections to pump high-pressure oil through hydraulic motors that generate electricity which is sent through a cable to the grid (Anderson and Gardner 2005). Hawaii, Oregon, and Massachusetts are participating in similar tests.

Rationale for Elimination

More than 1,000 patents for wave power machines are registered in the world today. The main parts of these patents are in the theoretical stages and only few plants have been built and tested. No commercial plants have been built yet. Therefore, wave power is new and may not be technologically feasible as an alternative to the SFERP. There would also be regulatory feasibility issues associated with permitting from the California Coastal Commission and the California State Lands Commission and also possible the USACE or the BCDC depending on location.

One big problem thus far with wave power systems is that of building and anchoring something that can withstand the roughest conditions at sea, yet can generate a reasonable amount of power from small waves. Wave power must be located where waves are consistently strong and even so the production of power depends on the size of waves resulting in large differences in the amount of energy produced. Unlike tidal energy, wave energy is much harder to predict and it is not consistent. Therefore in addition to feasibility concerns, there are reliability concerns, which would not make it a viable alternative.

Geothermal Resources

Alternative Description

Geothermal technologies use steam or high-temperature water (HTW) obtained from naturally occurring geothermal reservoirs to drive steam turbine/generators. There are vapor dominated resources (dry, super-heated steam) and liquid-dominated resources where various techniques are utilized to extract energy from the HTW.

Geothermal plants account for approximately five percent of California's power, and range in size from under 1 MW to 110 MW. Geothermal plants typically operate as base-load facilities and require 0.2 to 0.5 acre/MW. California is the largest geothermal power producer in the United States, with about 2,560 MW installed gross capacity and 1,754 MW net capacity (CEC 2003a). Geothermal plants provide highly reliable base-load power, with capacity factors from 90 to 98 percent.

Geothermal plants must be built near geothermal reservoir sites, because steam and hot water cannot be transported long distances without significant thermal energy loss. Geothermal power plants are operating in the following California counties: Lake, Sonoma, Imperial, Inyo, Mono, and Lassen. The gross capacity of The Geysers, located in Sonoma and Lake Counties near the City of Santa Rosa, is currently about 1,700 MW from 21 power plants.

Geothermal projects have fairly high capital costs, as compared to many other power generation technologies. New plants that are expansions of fields, such as in the

Imperial Valley, will be less expensive than the construction of geothermal plants in new fields. This aspect has been a deterrent for some developers. The total capital cost to build a 25 to 50 MW flash plant in today's market varies from about $2,100/kW to $2,600/kW. The capital costs of developing 10 to 30 MW binary plants range from $3,000/kW to $3,300/kW. Many factors dictate the ultimate capital costs including resource temperature and chemistry, productivity of each well, size of the facility, type of terrain, H_2S abatement requirements, etc. The turbines are generally custom made (from standard frame sizes) to match the characteristics of the resource and the design approach to the other major plant equipment (CEC 2004 - Comparative Study of Transmission Alternatives, Background Report).

Rationale for Elimination

Geothermal is a commercially available technology, but it is limited to areas geologic conditions resulting in high subsurface temperatures. Even in areas where such conditions are present, there have been issues with the reliability of the steam supply and the corrosiveness of the supply. There are no viable geothermal resources in the CCSF region.

Biomass

Alternative Description

Biomass electricity is generated by burning organic fuels in a boiler to produce steam, which then turns a turbine. Biomass can also be converted into a fuel gas such as methane and burned. Wood is the most commonly used biomass for power generation. Major biomass fuels include forestry and mill wastes, agricultural field crop and food processing wastes, and construction and urban wood wastes. Several techniques are used to convert these fuels to electricity, including direct combustion, gasification, and anaerobic fermentation. Biomass facilities do not require the extensive amount of land as the other renewable energy sources discussed above.

Currently, 2.2 percent of the state's electricity derives from biomass and waste-to-energy sources. Most biomass plant capacities are in the 3 to 10 MW range and typically operate as base-load capacity. Unlike other renewables, the locational flexibility of biomass facilities would reduce the need for significant transmission investments. The total California plant operating capacity is about 610 MW, and the idle capacity is about 122 MW. A number of biomass plants have been dismantled (CBEA 2003).

Rationale for Elimination

Most biomass facilities produce only small amounts of electricity (in the range of 3 to 10 MW), and so could not meet project objectives. There is no source of fuel (usually agricultural waste) for biomass facilities in the San Francisco area. Biomass facilities also generate significant air emissions and require numerous truck deliveries to supply the plant with the waste. Also, in waste-to-energy facilities there is some concern regarding the emission of toxic chemicals, such as dioxin, and the disposal of the resultant toxic ash.

DEMAND-SIDE MANAGEMENT

Alternative Description

The Warren-Alquist Act specifically prohibits the Energy Commission from considering conservation programs as alternatives to a proposed generation project. Public Resources Code Section 25305(c) states that conservation, load management, or other demand reducing measures reasonably expected to occur shall be explicitly examined in the Energy Commission's energy forecasts and shall not be considered as alternatives to a proposed facility during the siting process. Therefore, the approximate effect of such programs has already been accounted for in the agency's "integrated assessment of need," and the programs would not in themselves be sufficient to substitute for the additional generation calculated to be needed. The forecast that will address this issue is the Energy Commission's California Energy Outlook. The Warren-Alquist Act was amended in 1999 to delete the necessity of an Energy Commission finding of "need" in power plant licensing cases.

While these load management tools are not fully analyzed as alternatives to the SFERP project they are described herein for the benefit of the public and decisionmakers.

Demand-side management programs are designed to reduce customer energy consumption. Regulatory requirements dictate that supply-side and demand-side resource options should be considered on an equal basis in a utility's plan to acquire lowest cost resources. One goal of these programs is to reduce overall electricity use. Some programs also attempt to shift such energy use to off-peak periods.

Demand-side management includes a variety of approaches, including energy efficiency and conservation, building and appliance standards, load management and fuel substitution. Since 1975, the displaced peak demand from all of these efforts has been roughly the equivalent of eighteen 500 MW power plants. The annual impact of building and appliance standards has increased steadily, from 600 MW in 1980 to 5,400 MW in 2000, as more new buildings and homes are built under increasingly efficient standards (CEC 2003b). Savings from energy efficiency programs implemented by utilities and state agencies have also increased (from 750 to 3,300 MW). During the summer of 2001, between 70 to 75 percent of the peak load reductions came from consumer conservation efforts, while 25 to 30 percent came from energy efficiency investments (CEC 2003b).

California Energy Commission

One alternative to a power generation project could be programs to reduce energy consumption. In spite of the State's success in reducing demand in 2001, California continues to grow and overall demand is increasing. The 2002-2012 Electricity Outlook Report (CEC 2002c) concludes that, despite exceptional conservation efforts in 2001, voluntary demand reduction will likely decrease over time.

While conservation and demand reduction programs are not considered as alternatives to a proposed project, the Energy Commission is responsible for several such programs, the most notable of which are energy efficiency standards for new buildings and for major appliances. These programs are typically called "energy efficiency," "conser-

vation," or "demand side management" programs. One goal of these programs is to reduce overall electricity use; some programs also attempt to shift such energy use to off-peak periods.

The Energy Commission's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The Energy Commission adopted new standards in 2001, as mandated by Assembly Bill 970 to reduce California's electricity demand. The new standards went into effect on June 1, 2001. In 2004, the Energy Commission adopted updated and more stringent standards that supersede the 2001 standards and will take effect on October 1, 2005, following their publication as part of the State Building Code (CEC 2005 - Title 24, Part 6, of the California Code of Regulations: California's Energy Efficiency Standards for Residential and Nonresidential Buildings). Since 1975, the displaced peak demand from these conservation efforts has been roughly the equivalent of eighteen 500 MW power plants. The annual impact of building and appliance standards has increased steadily, from 600 MW in 1980 to 5,400 MW in 2000, as more buildings and homes are built under increasingly efficient standards (CEC 2002c).

After the California Independent System Operator (CA ISO) ordered rolling blackouts in January 2001 as a result of statewide electricity shortages, conservation efforts initially resulted in dramatic reductions in electricity use. Electricity use for each month in 2001 ranged from 5 percent to 12 percent less than it was in 2000. However, by 2002 demand began to increase as the memories of rolling blackouts faded.

The Energy Commission is also responsible for determining what the state's energy needs are in the future, using 5- and 12-year forecasts of both energy supply and demand. The Energy Commission calculates the energy use reduction measures discussed above into these forecasts when determining what future electricity needs are, and how much additional generation will be necessary to satisfy the state's needs.

Having considered all of the demand side management that is "reasonably expected to occur" in its forecasts, the Energy Commission then determines how much electricity is needed. The most recent estimation of electricity needs is found in the 2002-2002 Electricity Outlook Report (available on the Energy Commission's website).

The California Energy Commission's forecasts contain assumptions regarding conservation. As detailed in the Energy Commission's 2002-2012 Electricity Outlook Report, February 2002, "The uncertainty about what caused the demand reduction in the summer of 2001, in particular, the uncertainty about how much was due to temporary, behavioral changes and how much was due to permanent, equipment changes contributes to increased uncertainty about future electricity use trends. The three scenarios discussed in this chapter were developed to provide a range of possible electricity futures that account for the demand reductions of the summer of 2001 and uncertainties about future demand reductions and future economic growth. These scenarios combine different levels of temporary and permanent reductions to capture a reasonable range of possible electricity futures."

The Energy Commission report describes the three scenarios as follows: "The most likely scenario, labeled "Slower Growth in Program Reductions, Faster Drop in Voluntary Reductions . . .," assumes that program benefits increase in 2002 but stay constant after that, while voluntary impacts on energy consumption reduction decrease more rapidly starting with a drop of 1,500 MW in 2002. The lower scenario, labeled "Slow Growth in Program Reductions, Slow Decline in Voluntary Reductions," assumes that program impacts grow from 2001 to 2006 while benefits of voluntary reductions drop slowly over the period after a drop of 1,000 MW in 2002. The higher scenario, labeled 'No growth, then drop in Program Reductions, No Voluntary Reductions," assumes that there are no benefits from voluntary actions in 2002 and after, while benefits of programs stay constant until 2005 and then start declining."

California Public Utilities Commission

In addition, the CPUC supervises various demand-side management programs administered by the regulated utilities, and many municipal electric utilities have their own demand-side management programs. The combination of these programs constitutes the most ambitious overall approach to reducing electricity demand administered by any state in the nation. In spite of the state's success in reducing demand to some extent in 2001, California continues to grow and overall demand is increasing. Economic and price considerations but also long-term impacts of state-sponsored conservation efforts, such as the Governor's 20/20 rebate program and new appliance efficiency standards are considered in load forecasts. However, there are electricity-trend uncertainties about how much the demand reduction in the summer of 2001 was due to temporary behavioral changes and how much was due to permanent equipment changes.

City and County of San Francisco

In July 2003, the San Francisco Board of Supervisors approved a $16.3 million joint energy efficiency pilot project with Pacific Gas and Electric Company (PG&E) and San Francisco's Environment Department (SF Environment). The San Francisco Peak Energy Pilot Program is designed to increase reliability by reducing peak energy demand for both residential and business customers.

This program is funded by California utility customers and administered by the investor owned utilities under the auspices of the California Public Utilities Commission. The ultimate goal of the program is to reduce electric demand during both the peak summer air conditioning and winter heating seasons. Implementation of the project will include nine energy efficient program elements aimed at reducing usage in San Francisco by 16 MW by January 2005 to assist in the closure of Hunter's Point Power Plant.

Through a portfolio of energy efficiency programs, PG&E and SF Environment will work with hotel/motel, restaurant, and apartment owners. The programs are also designed to assist low-income residents and a special emphasis will target the Bayview-Hunter's Point community. Some of the many programs include the following for each of the customer classes (SF Environment 2003):

Residential:

- **Residential Direct Install Program:** PG&E will leverage contacts being made by the Low Income Energy Efficiency Program to identify homes that qualify for the

direct installation of a variety of energy efficiency measures including interior hardwired fixtures, compact fluorescent lamps, programmable thermostats, increased incentives for second refrigerator turn in and halogen torchiere turn in/exchange. Special emphasis will be placed on working with CARE participants, seniors and board and care facilities.

- **Multifamily Energy Efficiency Rebate (MF):** Cash rebates will be available for the installation of qualified energy efficiency products in apartment dwelling units and common areas of apartment and condominium complexes.
- **Residential Case Studies:** SF Environment and PG&E will study residential building types in order to verify San Francisco's residential electric heating peak and how energy efficiency and other measures may be used to manage this peak.

Businesses:

- **Cash Rebates for Business Customers:** Cash rebates will be available for all business customers who replace old equipment with new energy efficient technologies.
- **Standard Performance Contracts (SPC):** SPC will offer business customer's financial incentives based on verified energy savings and demand reductions resulting from custom-designed projects.
- **Targeted System Energy Audits:** PG&E will provide specialized energy audits to large commercial customers who have a high potential for peak demand reduction.
- **Commercial Turnkey Services for Small and Medium Businesses:** SF Environment and PG&E will assist business customers to identify potential energy-saving opportunities and will help business customers find service providers to install energy efficient equipment and complete paperwork for applicable financial incentive programs.
- **Codes and Standards Support:** PG&E and SF Environment's building and planning department will provide energy efficiency review and recommendations on building projects that come to the planning department, promote incentive programs applicable to such projects, and analyze and draft potential energy efficiency ordinances to be considered for adoption for both existing and new buildings.
- **Emerging Technologies:** PG&E will demonstrate several new technologies for peak load reduction at customer sites in the city and promote project results to the applicable customer sectors.

Pacific Gas and Electric

Finally, PG&E themselves uses a program of voluntary reduction in electricity use known as Customer Energy Efficiency (CEE) in the project area. PG&E has had an active CEE program over the past two decades. Its cumulative reduction of use has been substantial. For any given planning area, the historical CEE energy and peak demand impacts have been subsumed within the peak load demands experienced year by year and thus their impacts are included in the forecast of peak growth. As for future potential CEE impacts, PG&E's Local Integrated Resource Plan (LIRP) study indicates that only 4 MW per year could be obtained through aggressive locally focused CEE.

Rationale for Elimination

Demand management can reduce energy consumption, thus reducing the need for gas-fired power generation. If demand were sufficiently reduced, all the effects of the Proposed Project would be avoided. However, as stated above, the Warren-Alquist Act specifically prohibits the Energy Commission from considering conservation programs as alternatives to a proposed generation project. In addition, demand-side management has been shown to be effective only at a relatively small scale, but not on a scale that would be required to replace the 145 MW SFERP.

DISTRIBUTED GENERATION

Alternative Description

The Energy Commission defines DG as "generation, storage, or demand-side management devices, measures, and/or technologies connected to the distribution level of the transportation and distribution grid, usually located at or near the intended place of use (CEC 2002b). There are many DG technologies, including microturbines, internal combustion engines, combined heat and power (CHP) applications, fuel cells, photovoltaics and other solar energy systems, wind, landfill gas, digester gas and geothermal power generation technologies. Distributed power units may be owned by electric or gas utilities, by industrial, commercial, institutional or residential energy consumers, or by independent energy producers. To the extent that it is established, DG acts to either reduce the load on the PG&E system or be applied as additional system generation. In either case, it would help to support PG&E's ability to meet the applicable reliability criteria.

Distributed generation is the generation of electricity from facilities that are smaller than 50 MW in net generating capacity. Local jurisdictions—cities, counties and air districts—conduct all environmental reviews and issue all required approvals or permits for these facilities. Most DG facilities are very small, for example, a fuel cell can provide power in peak demand periods for a single hotel building. More than 2,000 MW of DG is now in place in California.

There are several incentive programs designed to provide financial assistance to those interested in operating Distributed Generation systems in California. Senate Bill 1345 (Statutes of 2000, Chapter 537, Peace, signed by Governor Davis in September 2000) directs the Energy Commission to develop and administer a grant program to support the purchase and installation of solar energy and small distributed generation systems. Solar energy systems include solar energy conversion to produce hot water, swimming pool heating, and electricity, as well as battery backup for PV applications. Small distributed generation systems include micro-cogeneration, gas turbines, fuel cells, electricity storage technologies (in systems other than PV), and reciprocating internal combustion engines.

Some problems of specific types of distributed generation include the following:

- **Renewable Energy Sources.** As discussed above, the high cost and limited dispatchability of small-scale renewable energy sources such as solar and wind power essentially inhibit their market penetration (Iannucci, et al., 2000; see the following section for discussion of larger scale renewable energy). In addition, biomass and wind

facilities require specific circumstances for siting (i.e., near sources of bio-fuel or in high wind areas), and have their own environmental consequences (e.g., requiring large land areas or resulting in large quantities of air emissions).

- **Fuel Cells.** The present high cost of and small generation capacity of fuel cells precludes their widespread use.
- **Other Fossil-fueled Systems.** Microturbines and various types of engines can also be used for distributed generation; these technologies are advancing quickly, becoming more flexible, and impacts are being reduced. However, they are still fossil-fueled technologies with the potential for significant environmental impacts, including noise. Such systems also have the potential for significant cumulative air quality impacts because individually they are typically small enough to avoid the regulatory requirements for air pollution control. Therefore, use of enough of these systems to constitute an alternative to the Proposed Project would potentially cause significant unmitigated air quality impacts.

Rationale for Elimination

While DG technologies are recognized as important resources to the region's ability to meet its long-term energy needs, DG does not provide a means for the applicant to meet its objectives for the Project because of the comparatively small capacity of DG systems and the relatively high cost.

Consideration of DG as an alternative to the SFERP is not feasible because no single entity has proposed implementing a substantial DG program. Also, a number of serious barriers, including technical issues, business practices, and regulatory policies, make interconnection to the electrical grid in the United States difficult. Broad use of distributed resources would likely require regulatory support and technological improvements. There could be regulatory feasibility issues with the lengthy permitting process. Air permits are generally the first permits sought for DG facilities because air district requirements influence equipment selection. Once the DG equipment has been selected, the land use approval process can begin. Local governments must know what makes and models of equipment will be installed to evaluate potential significant environmental impacts (e.g., noise and aesthetics) and to specify mitigation measures. Building permits are sought last because construction plans must incorporate all project changes required by the local government planning authority to mitigate environmental impacts. This lengthy permitting process would make it impossible to construct this technology within the timeframe of the SFERP.

In a report on DG (January 2002) the Energy Commission concluded that "DG is capable of providing several Transmission and Distribution (T&D) services, but the extent to which DG can be successfully deployed to effectively supply them are limited by (1) the technical capabilities of various DG technologies; (2) technical requirements imposed by the grid and grid operators; (3) business practices by T&D companies; and (4) regulatory rules and requirements . . . some technical barriers resulting from key characteristics of the prime mover will prevent some DG technologies from providing certain T&D services."

Potential new impacts created by DG would depend on the type of generation that would be used. Impacts of solar and wind facilities are addressed above. Other types of DG have air quality and noise impacts.

INTEGRATED RESOURCES ALTERNATIVE

Alternative Description

An integrated resources alternative could be made up of several components, rather than consideration of only a generation project. The components could include a combination of the following:

- Demand-side management
- Transmission system upgrades
- Development of solar power and other renewables
- Distributed generation
- Generating facilities or co-generation facilities.

Integrated resource planning (IRP) emerged in the 1980s as an analytic means of incorporating demand-side resources (i.e., energy efficiency and load management) into resource planning, as well as incorporating other factors such as uncertainty and environmental quality. As a planning methodology IRP integrates supply and demand-side options for providing energy services at a cost that appropriately balances the interests of all stakeholders. It incorporates into electricity planning the environmental and social aspects of electricity production, as well as the potential for reducing or shaping electricity demand. Whereas traditional planning for the energy sector primarily focused on energy supply and the financial interests of the power company, IRP aims at providing energy services (as distinct from energy per se) to the society at lowest cost and with the least negative impacts. Systematic analysis of all possible strategies to meet the energy service needs is undertaken, taking into account all future scenarios. This poses an analytical challenge, which is met through twin concepts of transparency and expert review.

The objective of IRP is to determine the least-cost solution to a capacity shortage or reliability problem by evaluating the cost-effectiveness of distributed resources, such as small-scale distributed generation (DG) and demand-side management (DSM) technologies, as well as proposed T&D capacity expansion projects. Under IRP, measures to reduce demand for power through energy efficiency and conservation would have to be considered on an equal footing with new proposals for power production. Uncertainties and risks with respect to demand and financial consequences are explicitly recognized and strategies are evolved to manage them. Importantly, the environmental and social impacts of strategies are fully integrated into the decision making process. It is recognized that as long as alternate resources are ranked according to economic criteria alone, neither the criterion of sustainability nor that of least total cost to society could be met.

This type of integrated resources planning is being implemented by the CCSF, with the combination of its Electricity Resource Plan discussed above.

Rationale for Elimination

None of these alternatives individually meet the stated project objectives. Depending on which configuration of the options would be implemented would determine overall effects of this alternative. The individual discussions above address potential impacts that would be created by the individual technology options.

Taken together and if implemented, they would diversify the system and would add needed capacity. Each of these components is technically feasible, and each could be implemented on a limited scale in CCSF, but there is no certainty of their implementation, especially within the timeframe required under the DWR Power Purchase Agreement (PPA).

Each also has environmental and regulatory obstacles to their implementation (described in the individual sections above). The combination of these alternatives would have no fewer obstacles than they would individually. Furthermore, implementation of a combination of resources could not be accomplished by the applicant in this project, and would require regulatory changes or financial incentives that are not available in today's market.

APPENDIX C. CA ISO COMMUNICATIONS

Following this page are copies of the following communications:

- April 18, 2003 CA ISO letter;
- October 22, 2003 CA ISO letter;
- CA ISO Matrix forwarded to CCSF on February 9, 2004
- July 1, 2004 letter
- CA ISO San Francisco Action Plan, September 2004
- CA ISO San Francisco Revised Action Plan, approved November 5, 2004
- CA ISO Response to September 14, 2004 CCSF Letter

CALIFORNIA ISO

California Independent System Operator

Terry M. Winter
President and Chief Executive Officer

April 18, 2003

Mr. Kevin Dasso
Director, Electric T&D Engineering
Pacific Gas and Electric Company
PO Box 770000; Mail Code H11J
San Francisco, CA 94177-0001

Ms. Theresa Mueller
Deputy City Attorney
City and County of San Francisco
City Attorney's Office
City Hall, Room 234
San Francisco, CA 94102

Subject: ISO Management Position on the Retirement of Hunters Point Unit 4

Dear Mr. Dasso and Ms. Mueller:

As you know, uncertainty surrounding the future continued operation of existing generation at Hunters Point Power Plant and Potrero Power Plant Unit 3 is a major consideration in assessing reliability issues in the San Francisco Peninsula Area. While these generating facilities provide a significant amount of load serving benefit to the San Francisco Peninsula Area, their continued operation beyond 2005 is questionable without addressing the upgrades that would be required at these plants to meet new air emission limitations that have been imposed on the Bay Area air quality region. ISO Management believes it is prudent to move forward with the installation of improved air pollution equipment for Potrero Power Plant Unit 3 to assure that there will continue to be base load generation available to serve existing and future Pacific Gas & Electric Company ("PG&E") customers beyond 2005. However, the future need for generation at Hunters Point, specifically Unit 4, continues to remain murky due to its age, the cost effectiveness of investing additional dollars towards upgrading this plant, and local community concerns related to the emissions from the plant.

In response to the uncertain availability of generation within the City of San Francisco ("City"), the ISO is aware of two generation projects that are currently being proposed for location within the San Francisco Peninsula Area. One project is by Mirant, who is proposing to construct Potrero Unit 7, a new 540 MW combined-cycle generating plant located within Mirant's existing Potrero Power Plant site. The ISO has provided testimony at the California Energy Commission Potrero 7 Application for Certification hearings in support of Unit 7 on the basis that it would be a suitable replacement for the aging Hunters Point Unit 4.

The second proposed generation project is by the City, who, as part of the settlement of a lawsuit brought against the Williams Companies by the State of California and the City, will receive four General Electric LM6000 gas turbines that could be sited at locations within the San Francisco Peninsula Area. The City has informed the ISO of its specific intent to locate these gas turbines in a manner that would enhance the electric reliability of San Francisco and enable the shutdown of Unit 4. Through technical analysis performed in cooperation with PG&E, the ISO has determined that the City's goal can best be served by siting the four Combustion Turbines ("CTs") where they can be directly connected to the existing 115kV transmission network within the City. The City has informed ISO Staff that their ability to site these new turbines within the City is justified if they directly support the retirement of Hunters Point Unit 4. As such, they have requested the ISO to provide them specific, additional conditions under which the ISO would not renew the Reliability Must-Run Contract for Hunters Point Unit 4 if the four CTs were sited within the City of San Francisco. The four CTs represent a total output of 180 MW, an amount slightly greater than the maximum output of Unit 4 (170 MW).

In March 2003, the ISO released a draft report entitled "San Francisco Peninsula Load Serving Capability" which documents a rather significant and comprehensive study mounted by the ISO to address questions being raised by stakeholders relating to San Francisco Peninsula Area load serving capability. The objective of the ISO's study was to provide stakeholders an independent, comprehensive determination of the maximum San Francisco Peninsula Area load serving capability under a multitude of future generation and transmission scenarios. The study provides a broad based understanding of the load serving needs of the San Francisco Peninsula Area and how existing and proposed transmission and generation facilities can reliably serve the load in this area. In particular, the study provides insight into the viability of the request by the City and PG&E to replace Hunters Point Unit 4 with four CTs.

While the ISO's comprehensive San Francisco Peninsula Area load serving capability study provides key load serving information about the San Francisco Peninsula Area, a companion ten-year load forecast for the area is needed to thoroughly assess the City's proposal. PG&E's most recent load forecasts for the San Francisco Peninsula Area have been recently distributed. The ISO has extensively reviewed this forecast and considers it to be representative of the expected "1 in 10 Year" electric demand for the San Francisco Peninsula Area through 2013.

Based on the results of the ISO's comprehensive study, the ISO has concluded that if Hunters Point Unit 4 is retired before 2005, there is inadequate load serving capability to serve the expected load in the San Francisco Peninsula Area unless additional generation and/or transmission reinforcement is constructed to support load growth in the area. In consideration of the request by the City and PG&E, the ISO has evaluated the viability of replacing Hunters Point Unit 4 with the four CTs proposed by the City. Again, based on the results of the ISO's comprehensive load serving study, the ISO has determined that the CTs, if located within the City, would be a suitable replacement for Hunters Point Unit 4, if and only if all the transmission system reinforcements, as indicated in the attached "ISO Terms and Conditions Allowing the Replacement/Shutdown of Hunters Point Unit 4", are completed and placed in-service prior to the retirement of Hunters

Point Unit 4. Once these conditions are met, the ISO will not renew the RMR Contract for Hunters Point Unit 4.

In closing, I want to reiterate ISO Staff comments which have been made to the City of San Francisco, PG&E, and other stakeholders; that the ISO shares the City's and PG&E's desire to retire all generation at Hunters Point in a manner that maintains a level of system reliability which the ISO is charged with providing. The ISO supports the City of San Francisco and PG&E's step-wise approach to addressing the retirement of generation at Hunters Point, and working towards retiring Hunters Point Unit 4 is a first step. ISO Management is expecting a continued, positive working relationship with the City of San Francisco and PG&E towards also addressing and facilitating the ultimate retirement of Hunters Point Unit 1.

If you have any questions, please contact Armando Perez at (916) 351-4400 or Gary DeShazo at (916) 608-5880.

Sincerely,

Terry M. Winter

Terry M. Winter
President and Chief Executive Officer

Attachment

cc: CAISO Board of Governors
CAISO Board Assistants
CAISO Officers
Armando J. Perez, CAISO
Gary DeShazo, CAISO
Richard Cashdollar, CAISO
Jeanne Sole, CAISO
Ed Smeloff, City of San Francisco
Ralph Hollenbacher, City of San Francisco
David Freeman, California Power Authority
Dick Ferreira, California Power Authority
Kellan Fluckinger, California Power Authority
Manho Yeung, Pacific Gas and Electric Company

ISO Terms and Conditions
Allowing the Replacement/Shutdown of Hunters Point 4
Through the Installation of Four CTs

The following list of conditions describes the conditions under which the ISO would not renew the RMR Contract for Hunters Point 4 and allow it's retirement. Full completion of these conditions would be required to allow the shutdown of Hunters Point 4: delays, partial completion, or omission of any item may prolong the need to retain Hunters Point 4 as an RMR unit unless agreed to by the ISO.

Baseline Assumptions

Hunters Point 4 retirement conditions are predicated on several critical baseline assumptions and present-day elements which are assumed in place at the time of retirement. These are as follows:

1. Potrero Unit 3 (206MW), and Units 4, 5, and 6 (52MW each) remain operational and fully available at their present day capacity.

2. Mirant will complete the installation of the Potrero 3 SCR, expected by second quarter 2005.

3. Hunters Point Combustion Turbine Unit 1 (52MW) will remain operational and fully available at its present day capacity.

4. Hunters Point Units 2 and 3 are fully operational as synchronous condensers, or a comparable replacement of reactive support is installed. A comparable replacement would be PG&E's presently proposed project to install a +240/-100 MVAR Static VAR Compensator at Potrero Switchyard. This project has already been approved by the ISO and is expected to be operational by September 2004.

5. Critical elements of the present-day Greater Bay Area transmission system are available at their present day capacity. For example, it is assumed that existing 115kV internal SF underground cables will not have experienced any permanent failures or abandonment. Alternatively, it is assumed that facilities such as the Tesla 500/230kV transformer #6 are still in service at its present capacity.

Future Requirements

The following future events and grid upgrades must be completed to allow the retirement and shutdown of Hunters Point Unit 4. It should be noted that any deviations from these required projects may require additional reinforcements to address these deviations.

1. **Installation of four 45 MW combustion turbines electrically connected to the internal San Francisco 115kV transmission network.** This installation (or an equivalent or greater generation project) must be fully installed and capable of providing no less than 495,000MWhrs per year[1]. The ISO will require overlapping availability of Hunters Point 4 and the new generation project until the turbine project has completed a performance test agreed to be sufficient by the ISO. *Status: On April 10, 2003 CCSF initiated the generation interconnection study for this project and it's various alternatives. Expected completion date unknown, tentatively expected third quarter 2005?*

2. **Newark-Ravenswood 230kV Line Rerate.** PG&E to increase the emergency rating of the Newark-Ravenswood 230kV line using a higher wind speed assumption, and replace 230kV switches. The line's emergency rating will be increased from 2,110 Amps to 2,500 Amps. *Status: COMPLETE, and the CAISO Transmission Registry has been updated.*

3. **Ravenswood-San Mateo 115kV Line Rerate.** PG&E to increase the emergency rating of the Ravenswood-San Mateo 115kV line using a higher wind speed assumption. The line's emergency rating will be increased from 522 Amps to 618 Amps. *Status: COMPLETE, and PG&E has requested the ISO to update the Transmission Registry.*

4. **Tesla-Newark #2 230kV Line Rerate/Upgrade.** PG&E to increase the emergency rating of the Tesla-Newark #2 230kV line using a higher wind speed assumption, and replace 230kV switches. The line's emergency rating will be increased from 1,714 Amps to 1,954 Amps. *Status: UNDER CONSTRUCTION, completion expected May 2003.*

5. **Ravenswood 230/115kV Transformer.** PG&E to Install a new second 230/115kV transformer (420MVA) at Ravenswood. *Status: ENGINEERING & PROCUREMENT, completion expected May 2004.*

6. **San Mateo-Martin #4 Line 60-115kV Voltage Conversion.** PG&E to reconductor and convert the San Mateo-Martin 60kV circuit to 115kV operation. Substation modifications are also needed at Burlingame and Millbrae. *Status: Permit application filed with the CPUC in November 2002; PEA Application deemed complete on March 24, 2003. Expected completion of June 2004 or later depending on permit requirements.*

[1] Based on 2003 Contracted RMR MWHrs for HP4; HP4 2002 actual MWHrs = 448,371.

7. **Potrero-Hunters Point ("AP-1") 115kV Underground Cable.** PG&E to complete construction of a new 115kV underground cable between Potrero and Hunters Point. *Status: PG&E and CCSF are working on a joint project and completing the needed environmental impact report, June 2004 or later depending on permit requirements.*

CALIFORNIA ISO

Larry M. Wenzel
President and Chief Executive Officer

California Independent System Operator

October 22, 2003

Via Facsimile and US Mail

Office of Supervisor Sophie Maxwell
Board of Supervisors of the City and County of San Francisco
1 Dr. Carlton B. Goodlett Place, Room 279
San Francisco, CA 94102

Subject: Request for Additional Information on Shutting Down Generation At the Hunters Point and Potrero Power Plants

Dear Supervisor Maxwell:

Thank you for your letter dated September 23, 2003, addressing the concerns of the City and County of San Francisco ("City") related to the future operation of generator units within the City. Over the past year ISO staff has spent a great deal of time and effort working with stakeholders representing the City, Pacific Gas and Electric Company ("PG&E"), and many members of the Potrero and Hunters Point/Bayshore communities. The ISO recognizes that there are wide-ranging interests regarding the future of generation at Hunters Point Power Plant ("Hunters Point") and Potrero Power Plant ("Potrero") and that the concerns and issues voiced by all stakeholders are an important part of deciding how best to serve the demand for energy in San Francisco. The ISO staff has participated in numerous community and City forums where our goal has been twofold; 1) Raise stakeholder's technical understanding of how the electrical system within the San Francisco Peninsula Area[1] works to serve the load in this area and 2) Pursue the ISO's mandated mission to assure a reliable transmission system is in place to serve the load.

San Francisco Peninsula Load Serving Capability Study

In July 2003, the ISO finalized its report entitled "San Francisco Peninsula Load Serving Capability" which documents a rather significant and comprehensive study mounted by the ISO to address questions being raised by stakeholders relating to San Francisco Peninsula Area load serving capability. While the stated objective of the ISO's study was to provide stakeholders an independent, comprehensive determination of the maximum San Francisco Peninsula Area load-serving capability under a multitude of future generation and transmission scenarios, its true value has been to provide stakeholders meaningful information to allow them to make informed decisions. This study, which had broad stakeholder input, is the first of its kind to be performed for this area and has, much to its credit, redefined the technical approach to assessing its reliability needs. PG&E and the City support the study's methodology and it will be the benchmark that

[1] In the testimony for the Jefferson-Martin Transmission Line, currently before the California Public Utilities Commission, the ISO refers to the City and County of San Francisco and the San Francisco Peninsula as the "San Francisco Peninsula Area." For clarity in this letter, the ISO will delineate separately, when necessary, the City, the Peninsula, and the Greater Bay Area even though the City is included in the Peninsula, which is included in the Greater Bay Area.

defines how all transmission assessment initiatives in this area will likely be performed from this point forward. The ISO has relied on this study's results and conclusions in addressing your questions and those of other stakeholders.

Retirement of Hunters Point Unit 1 and Unit 4

The ISO acknowledges the importance to the City and its citizens of retiring all generation at Hunters Point as well the City's desire to implement its Electricity Resource Plan. As such, the ISO remains committed to the goal of closing Hunters Point and will continue to work with the City and other stakeholders.

The City and PG&E have reached a conclusion that if all of the conditions outlined in the April 18, 2003 letter are met then Hunters Point Unit 1 can also be retired with Hunters Point Unit 4. The ISO does not agree with this conclusion. The ISO has consistently stated that generation within the City is needed to mitigate local area reliability constraints within the City, the Peninsula, and the Greater Bay Area. Put another way, the need for generation in the City is based not only on load-serving constraints within the City, but also throughout the Peninsula as well as the Greater Bay Area. Constraints outside of the City currently exist; and the ISO's "San Francisco Peninsula Load Serving Capability" study extensively documents them. It is the ISO's position that all constraints must be addressed to determine the need for generation within the City. Consistent with this position, the April 18, 2003, letter appropriately considers the entire Greater Bay Area when it delineates the conditions under which the ISO would not extend the RMR Contract for Hunters Point Unit 4. Without some suitable generation replacement or additional transmission infrastructure beyond what has been identified in the ISO's April 18, 2003 letter, Hunters Point Unit 1 is still needed to meet the local area reliability needs for the City, the Peninsula, and the Greater Bay Area.

The ISO has continued to assess the load serving capability of the City and the Peninsula and has come to the conclusion that in order to meet all grid planning and operational needs in this area approximately 400 MW[2] of generation must be located north of San Mateo. The four proposed combustion turbines being sited at or near Potrero is a necessary component to meeting this generation requirement to assure the future reliability of the City, the Peninsula, and the Greater Bay Area systems. This assessment is what led the ISO to conclude that the siting of four combustion turbines, totaling approximately 180 MW at or near Potrero, while a step in the right direction, is not enough to allow the retirement of all generation at Hunters Point. It is imperative that other transmission additions accompany the siting of the City's combustion turbine project in order to close all generation at Hunters Point.

To this end, the ISO and PG&E have proactively worked together over the past six months to define the necessary transmission additions that support our mutual goal of retiring generation at Hunters Point while maintaining the required level of reliability mandated by the ISO's Planning Standards. The culmination of our joint efforts is reflected in PG&E's near final 2003 ten-year transmission expansion plan, as presented to the stakeholders on October 14, 2003. The 2003 transmission expansion plan includes all transmission reinforcements delineated in the ISO's April 18, 2003 letter as well as other key projects that are necessary to retire all generation at Hunters Point provided the City's combustion turbine project is successfully sited at or near Potrero (see attachment 1). The ISO believes that while maintaining their commitment to retire

[2] The determination of 400MW was based on the following: 1) expected 2006 system configuration that assumes the Jefferson-Martin Project in-service; 2) a peak weekend San Francisco Forecast of 750MW; 3) and typical San Mateo wash clearance conditions. Changes in system configuration and/or load forecast projections may change the generation need.

Hunters Point, PG&E should remain focused on completing the necessary transmission upgrades/additions they have included in their 2003 transmission expansion plan. The ISO encourages the City and all community members to fully support these projects to assure that they will be completed in a timely manner.

Your September 23, 2003 letter posed several questions that directly relate to the conclusion that the ISO has reached with regard to generation at Hunters Point. Hopefully, our answers to your questions will provide you a better understanding of our position. For your convenience, we have inserted your questions in italics followed by the ISO's answer.

Q1) *Since your April letter outlining the conditions under which Hunters Point (HP) 4 could be released from its RMR contract, PG&E has completed its "San Francisco Internal Transmission System After AP-1 Technical Study." This study shows that under assumed new emergency ratings for the existing cables in the City, the need for local generation to serve internal City needs is substantially decreased. PG&E has also indicated its intention to reinforce the Tesla-Newark 230kv lines by the summer of 2005. Please indicate whether these changing circumstances will also allow the shutdown of HP1 and/or Potrero 3 with the installation of four turbines the City is attempting to install. Would the above answer change if only three turbines are installed? In your answer, please indicate whether the local remaining needs for local generation are dictated by local and Bay Area grid planning, RMR and/or operational needs. Please answer the above both with and without the addition of the Jefferson-Martin transmission project.*

A1) <u>The City's Internal 115 kV Cable System:</u>

To understand the ISO's position on the reliability needs for this area, it is important to understand the context in which PG&E's "San Francisco Internal Transmission System After AP-1 Technical Study" was performed.

The ISO's "San Francisco Peninsula Load Serving Capability" report identified, among other things, the need to address cable constraints internal to the 115kV system within the City. While the ISO's load-serving study assumed that a "cable fix" would be implemented by PG&E, the study did not recommend a specific transmission solution to resolve these constraints. Instead, the ISO recommended that PG&E undertake its own study of the City's 115kV cable system to identify an appropriate cable project to submit to the ISO for approval. PG&E performed the "San Francisco Internal Transmission System After AP-1 Technical Study" but PG&E limited the study's scope to the City's 115kV cable system. As a result, PG&E's study results, conclusions, and recommendations are reflective of that limited scope. While in concurrence with most of PG&E's study recommendations, the ISO has repeatedly stated that the ISO's own load-serving study clearly illustrates that transmission constraints exist not only within the City, but throughout the entire San Francisco Peninsula Area. In fact, the ISO load-serving study concludes that the load-serving capability of the San Francisco Peninsula Area is directly related to the capability of the transmission system in the San Mateo-Martin Corridor, the 230kV system south of San Mateo, and local transmission along the San Francisco Peninsula. The study also concludes that an accurate load-serving capability can be determined only if all San Francisco Peninsula Area constraints are appropriately addressed. Because PG&E limited the scope of their study to the system within the City, it is inappropriate to apply these results to the larger San Francisco Peninsula Area because they overstate the ability to serve load within the City.

Without Jefferson-Martin Transmission Line:

Given the above, the ISO has concluded that all generation at Hunters Point can be retired if the following is successfully completed:

1) All transmission and generation requirements identified in the ISO's April 18, 2003 letter;
2) The Tesla – Newark # 2 - 230kV line bundling is completed; and
3) The Ravenswood – Ames 115kV lines #1 & #2 are reconductored.

While the projects mentioned above support the local and Greater Bay Area grid planning standards, RMR requirements, and operational needs of the area, the Tesla-Newark project is key to reducing the RMR requirement within the Greater Bay Area. The Jefferson-Martin Project is a suitable replacement for the Tesla-Newark and Ravenswood-Ames projects from a local and Greater Bay Area grid planning and operational standards perspective, because they increase the transmission capacity through the San Francisco Peninsula. However, these projects have little impact on the RMR need for the Greater Bay Area. Therefore, while all of the projects mentioned above are needed to import the power required to meet area load serving needs, it is the Tesla-Newark project that is needed to effectively reduce the Greater Bay Area RMR requirement that is, in part, being met by the generation located within the City.

Installation of Only Three Combustion Turbines:

Given the current PG&E load forecast for the San Francisco Peninsula area, the installation of only three turbines at or near Potrero is not enough to meet the ISO Grid Planning Standards nor to meet the Operational need in the City and Peninsula. A net reduction in generation within the City must be countered by an increased flow of power over the transmission systems leading into and through the Peninsula and the City in order to serve the load in these areas. This added power flow places additional stress on these transmission systems and therefore has the overall impact of advancing the need for additional transmission infrastructure within these areas.

Potrero Unit 3:

Based on the generation needs that the ISO has identified, Potrero Unit 3 is required to be in-service. The ISO has not studied retirement of Potrero Unit 3, but it is expected that another 230kV import line similar to the Jefferson – Martin Project would be needed. As such, it is imperative that stakeholders next focus on the future transmission requirements of the Greater Bay Area to assure adequate planning for a robust system that optimizes the generation and transmission service to the City, the Peninsula, and the Greater Bay Area. This work will be carried forward in 2004 through the ISO's San Francisco Stakeholder Study Group. The City and all stakeholders are encouraged to participate in this study group.

Q2) *PG&E states in its August 5, 2003 letter to "Fellow San Franciscans," that any delays in PG&E projects which require approval by the CPUC "will make it unlikely that the CAISO will allow us to close the Hunters Point Power Plant by the end of 2005." We would like the ISO to allow the shutdown of HP immediately. If this is not possible, we certainly want to avoid the circumstance of*

PG&E retrofitting HP 4 just before the system additions that allow it to be closed are made. We are concerned that purposely removing HP 4 from service to install retrofits would jeopardize reliability to the City. And doing so just before other improvements are made to the electric system that would remove the need for HP 4 would not be cost effective. Please confirm that the ISO will consider a plan for PG&E to operate the Plant, as needed, through obtaining and utilizing interchangeable emission reduction credits (IERC), until the other improvements are in place.

A2) PG&E is correct that any delays in PG&E's proposed projects will impact the continued need to extend the RMR Agreement for Hunters Point Units 1 and 4. The ISO has consistently maintained that the generation at Hunters Point and Potrero play a key role in the overall reliability of this area and believes that the timely completion of PG&E's projects as well as the City's combustion turbine project are necessary components to achieve the retirement of generation at Hunters Point by the end of 2005.

Securing additional IERCs to operate Hunters Point Unit 4 beyond 2005 is the responsibility of PG&E as the plant owner and the Bay Area Air Quality Management District. The ISO would be supportive of any reasonable plan that would allow sufficient time for other transmission and/or generation alternatives to develop and avert a retrofit of Hunters Point Unit 4, provided the City, the communities, and the Bay Area Air Quality Management District are able to settle on a compliance plan. However, there is uncertainty in successfully achieving such a plan. Time is running very short on concrete solutions to this issue and at this point, in order to meet its reliability mandates, the ISO must approve a retrofit of Hunters Point Unit 4.

The ISO urges the City, PG&E, and community members to move expeditiously towards consensus on solutions such as supporting the City's combustion turbine project, the Jefferson – Martin Project, as well as all applicable transmission projects currently included in PG&E's draft 2003 transmission expansion plan.

Q3) Similarly, assuming Mirant were able to operate Potrero 3 using IERCs, would the ISO be willing to defer the retrofit of Potrero 3 until a time when the plant could be removed from service for a retrofit at less risk to the reliable electric service in San Francisco? And, to the extent this is not answered above, under what conditions would the ISO agree not to retrofit Potrero 3 and allow it to be retired completely?

A3) The answer to this question is similar the ISO's response to question 2. Again, securing additional IERCs to operate Potrero Unit 3 beyond 2004 is the responsibility of Mirant as the plant owner and the Bay Area Air Quality Management District. While the ISO would be supportive of any reasonable plan that would allow additional time to adjust the Potrero Unit 3 retrofit, it is highly unlikely that such alternatives can be secured in time to alter the current Potrero Unit 3 retrofit schedule. PG&E has informed the ISO that it intends to operate Hunters Point Unit 4 through 2005 to allow for the completion of the Potrero Unit 3 retrofit and the Jefferson – Martin 230kV Transmission Project. However, both of these projects face significant barriers to their successful completion such that their availability by the end of 2005 remains uncertain at best. To defer the Potrero Unit 3 retrofit to a later date is not in the best interests of PG&E's customers. Therefore, the ISO will proceed with the requirement to retrofit Potrero Unit 3.

The ISO urges the City, PG&E, and community members to move expeditiously towards consensus on solutions such as supporting the City's combustion turbine project, the Jefferson – Martin Project, as well as all applicable transmission projects currently included in PG&E's draft 2003 transmission expansion plan.

Q4) *PG&E has proposed to adopt emergency ratings for the old underground cables in San Francisco. This is consistent with the City's desire to reduce in-City generation. However, we want to ensure that it is also consistent with providing reliable service. Does the ISO believe that this re-rating is appropriate? If this re-rating is adopted, will the ISO require any additional measures to ensure reliability?*

A4) At this point in time, the ISO does not support the conclusion that PG&E has reached regarding the capability of the cables. These cables are very old and the ISO is concerned that they may be placed in higher stress situations than the engineering and operating assumptions used to calculate the ratings, exposing them to an increased risk of failure. The ISO is currently working with PG&E to resolve the issues surrounding the emergency ratings of the cables in the City. While PG&E retains the right to rate their facilities, the ISO has an obligation to assure itself and all stakeholders that new or changed ratings proposed by PG&E are based on good utility practice and that reasonable engineering and operating assumptions are used. The ISO is currently working with PG&E to clarify the foundational assumptions on which the proposed re-rates are based.

The ISO hopes that the information that has been provided has been informative and will help you in addressing your concerns. If you have any questions, please call Julie Gill at (916) 351-2221 or Gary DeShazo at (916) 608-5880.

Sincerely,

ORIGINAL SIGNED BY

Terry M. Winter
President & Chief Executive Officer

Cc: Gary DeShazo, ISO
Julie Gill, ISO
Kevin Dasso, PG&E
Edward Smeloff, SFPUC
Jared Blumenfeld, SFDoE
Theresa Mueller, Deputy City Attorney
Barry Flynn, Flynn & Associates

Attachment 1
Reference List of Projects

1. **Installation of four 45 MW combustion turbines electrically connected to the internal San Francisco 115kV transmission network.** This installation (or an equivalent or greater generation project) must be fully installed and capable of providing no less than 495,000MWhrs per year[3]. The ISO will require overlapping availability of Hunters Point 4 and the new generation project until the turbine project has completed a performance test agreed to be sufficient by the ISO. ***Status:*** *On April 10, 2003 CCSF initiated the generation interconnection study for this project and it's various alternatives. Expected completion date unknown, tentatively expected by end of 2005.*

2. **Jefferson-Martin 230 kV Line Project.** PG&E to increase the import capability into the San Francisco Area through building a new 230 kV line between Jefferson and Martin Substations. This line may be partly or all an underground cable. ***Status:*** *This project has been approved by the CA ISO and is presently within the CPUC CPCN process. The line is scheduled to be in Operation by Sept. 2005*

3. **Newark-Ravenswood 230kV Line Rerate.** PG&E to increase the emergency rating of the Newark-Ravenswood 230kV line using a higher wind speed assumption, and replace 230kV switches. The line's emergency rating will be increased from 2,110 Amps to 2,500 Amps. ***Status:*** *Completed*

4. **Ravenswood-San Mateo 115kV Line Rerate.** PG&E to increase the emergency rating of the Ravenswood-San Mateo 115kV line using a higher wind speed assumption. The line's emergency rating will be increased from 522 Amps to 618 Amps. ***Status:*** *Completed.*

5. **Tesla-Newark #2 230kV Line Rerate.** PG&E to increase the emergency rating of the Tesla-Newark #2 230kV line using a higher wind speed assumption, and replace 230kV switches. The line's emergency rating will be increased from 1,714 Amps to 1,954 Amps. ***Status:*** *Completed.*

6. **Tesla-Newark #2 230kV Line Upgrade.** PG&E to increase the rating by completing the bundling of the Tesla-Newark #2 230kV line with 954 ACSS conductor for approximately 8 miles out from Tesla Substation. ***Status:*** *Proposed within PG&E's 2003 Transmission Expansion Plan for May 2005 operation.*

7. **Ravenswood 230/115kV Transformer.** PG&E to install a new second 230/115kV transformer (420MVA) at Ravenswood. ***Status:*** *ENGINEERING & PROCUREMENT, completion expected May 2004.*

8. **Ravenswood-Ames #1 & #2 115 kV lines Reinforcement.** PG&E to increase the rating of the Ravenswood-Ames #1 & #2 115 kV lines by reconductoring them with 477 ACSS

[3] Based on 2003 Contracted RMR MWHrs for HP4; HP4 2002 actual MWHrs = 448,371.

conductor. ***Status:*** *Proposed within PG&E's 2003 Transmission Expansion Plan for May 2005 operation.*

9. **San Mateo-Martin #4 Line 60-115kV Voltage Conversion.** PG&E to reconductor and convert the San Mateo-Martin 60kV circuit to 115kV operation. Substation modifications are also needed at Burlingame and Millbrae. ***Status:*** *Permit application approved by the CPUC in October 2003; Expected completion of June 2004.*

10. **Potrero-Hunters Point ("AP-1") 115kV Underground Cable.** PG&E to complete construction of a new 115kV underground cable between Potrero and Hunters Point. ***Status:*** *PG&E and CCSF are working on a joint project and completing the needed environmental impact report, operation is scheduled for June 2004 or later depending on permit requirements.*

Friday 2:30 PM

ISO GRID PLANNING DRAFT

February 09, 2004

The objective of San Francisco is to shut down Hunter Point Power Plant. The objective of ISO is to ensure RMR, Operational and Reliability criteria are met.

There are several combinations of transmission and generation projects that appear capable of meeting both set objectives through 2006 (note the conditions). The combinations narrow when considering the conditions and compliance through 2010.

Transmission and Generation Combinations	Release Hunters Point 4 From Its RMR Contract	Release Hunters Point 4 & 1 From RMR Contracts	ISO San Francisco Operational and Reliability Criteria	
			Thru 2006	Thru 2010
Trans + OTP	No	No	No	No
Trans + 4 CTs	Yes	No	Yes	No
Trans + J-M	Yes *	No	Yes *	No
Trans + OTP + 3 CTs	Yes	Yes	Yes	No
Trans + OTP + (3+1) CTs	Yes	Yes	Yes	No
Trans + OTP + 4 CTs	Yes	Yes	Yes	No
1 or 2 CTs + Trans + J-M	Yes *	Yes **	Yes *	No
3 or 4 CTs + Trans + J-M	Yes	Yes	Yes	Yes

Trans – the six PG&E transmission system upgrades noted in April 18, 2003 letter
CTs – the City owned peaking power plants (have not begun permitting)
(3+1 CTs) – 3 CTs cited in the city and fourth at SF Airport
J-M – The Jefferson-Martin transmission project plus two associated transmission projects in Maxwell letter (J-M is in permitting)
OTP – Tesla – Newark #2 230kV Line Upgrade and Ravenswood – Ames #1 & #2 115kV Line Reinforcement

* Conditioned on using higher emergency ratings transmission internal to the City per a PG&E proposal. ISO and PG&E are currently addressing the viability of using these ratings. Resolution is expected in Q1, 2004.

** Conditioned on new Martin-Hunters Point transmission project going into service in 2007 per PG&E 2003 Expansion Plan. ISO will consider this condition as having been met when the Martin-Hunters Point transmission project is approved by the ISO Board, permitted and in operation. This line is currently scheduled for Q4 2007.

Further Considerations:

- PG&E and the City have an agreement that Hunters Point plants will be shut down when released from RMR contracts.
- The City may not understand that what is needed to release Hunters Point 4 from its RMR contract may not be sufficient to shut down both Hunters Point 1 & 4
- The City is contractually obligated to CERS to have purchased land by May 1, 2004. The dates have been extended once. ISO will not include the peakers in its assumptions until they are permitted and under construction.
- The six PG&E transmission projects identified in Terry Winter's April 18, 2003 letter are or near complete
- The Jefferson-Martin transmission project is being permitted. ISO includes this project in its assumptions for planning studies.

DATA RESPONSE ALT-16A3

DATA RESPONSE ALT-16B2

CALIFORNIA ISO

California Independent System Operator

li letmers
fi President, Grid Operations

July 1, 2004

Via Facsimile and US Mail

The Honorable Gavin Newsom, Mayor of the City and County of San Francisco
Ms. Sophie Maxwell, City and County of San Francisco Board of Supervisors
Mr. Jeffrey D. Butler, Pacific Gas and Electric Senior Vice President, Transmission and Distribution
Mr. Ralph Hollenbacher, San Francisco Public Utilities Commission

Subject: Shutting Down Generation At the Hunters Point and Potrero Power Plants

Dear Mayor Newsom, Ms. Maxwell, Mr. Butler, and Mr. Hollenbacher:

The California Independent System Operator Corporation ("ISO") has received letters from each of you concerning the shut down of generation at Hunters Point Power Plant ("Hunters Point") and Potrero Power Plant ("Potrero"). Because the questions being asked are similar, the ISO has taken the liberty of addressing all of the questions in this letter.

Over the past several years, ISO staff has spent a great deal of time and effort working with the City and County of San Francisco ("City"), Pacific Gas and Electric Company ("PG&E"), and many members of the Potrero and Hunters Point/Bayshore communities ("Parties") to address concerns and questions related to the need for generation at Hunters Point and Potrero. The ISO recognizes that there are wide-ranging interests regarding the future of generation at the Hunters Point Power Plant and the Potrero Power Plant and that the concerns and issues voiced by all stakeholders are an important part of deciding how best to serve the demand for energy in San Francisco. The ISO also believes that all parties share a common goal of providing the City[1] with reliable, secure and environmentally responsible electric service and that, although complex, resolving the issues that constrain the retirement of generation in San Francisco is obtainable over time. To this end, the ISO remains fully committed to supporting the City and PG&E in successfully achieving their goals while maintaining the reliability needs of the entire San Francisco Peninsula Area.

On April 15, 2004, ISO and PG&E representatives met to discuss the retirement of Hunters Point and the transmission upgrades necessary to allow the ISO to discontinue extending the Reliability Must Run ("RMR") Agreement for any of the Hunters Point units. ISO staff has worked closely with PG&E to make sure that all load serving capability, RMR, and operational reliability issues have been appropriately identified and addressed in PG&E's 2003 transmission expansion plan. In addition, PG&E informed the ISO that it intends to move forward with replacing the insulators on the San Mateo 230kV bus to eliminate the need to perform required maintenance washes during the summer months. This decision resolves the final operational reliability issue that, based on current studies, required the continued operation of Hunters

[1] In the testimony for the Jefferson-Martin Transmission Line, currently before the California Public Utilities Commission, the ISO refers to the City and County of San Francisco and the San Francisco Peninsula as the "San Francisco Peninsula Area." For clarity in this letter, the ISO will delineate separately, when necessary, the City, the Peninsula, and the Greater Bay Area even though the City is included in the Peninsula, which is included in the Greater Bay Area.

Point Unit 1 beyond 2005. Therefore, based on PG&E's completion of the 2003 Transmission Expansion Plan items outlined in your May 4, 2004 letter prior to the end of 2005 and the other critical assumptions listed below, the ISO anticipates being able to discontinue renewing the RMR Agreement for Hunters Point Units 1, 2, 3, and 4 for 2006.

As stated in their May 4, 2004 letter, PG&E shares the ISO's commitment to retiring Hunters Point in a manner that assures adequate load serving capability and system reliability. And while the ISO and PG&E are in agreement on what is needed to remove the Hunters Point facilities from their RMR designations at the end of 2005, this agreement is predicated upon the expectation that the retirement of these units will *not unduly jeopardize reliable electric service to PG&E's customers in the City and the San Francisco Peninsula Area*. Put another way, the ISO's support for retiring generation in the City is based on certain "critical assumptions" that are reasonably expected to occur. Of significant importance is the successful retrofit of Potrero Unit 3 with selective catalytic reducers. Retrofitting Potrero 3 has constituted a "critical assumption" in all conclusions that the ISO has presented to the parties today and in all previous ISO correspondence. Reiterating previous statements, the ISO has not studied or prepared scenarios without Potrero Unit 3 in place. Therefore, it should be clearly understood that the technical conclusions that allow for the retirement of generation at Hunters Point would be altered should Potrero Unit 3 not be able to operate beyond 2005. Notwithstanding the continued operation of Potrero Unit 3, other "critical assumptions" such as an accelerated increase in local area load growth, the unexpected retirement and/or failure of other local area generation in the Greater Bay Area, and/or the unexpected failure of critical elements of the transmission system that supports the City and San Francisco Peninsula Area, among others, would also have an impact on the ISO's technical conclusions that allow for the ISO to discontinue renewing the RMR Agreement for Hunters Point. While changes in these "critical assumptions" are uncontrollable, the ISO remains committed to work with PG&E to retire the Hunters Point facility by the end of 2005. It is anticipated that the ISO Board will make the final decision at its September 2005 meeting.

Of particular concern to the ISO is the timely completion of the Jefferson – Martin 230kV Transmission Project and the inability of Hunters Point Unit 4 to operate beyond 2005 due to Bay Area Air Quality issues. Even though PG&E clearly remains dedicated to completing this project on time, a reasonable probability still remains that Jefferson – Martin could be delayed until sometime in 2006. As the ISO stated in its October 22, 2003 letter to Supervisor Sophie Maxwell, securing the necessary interchangeable emission reduction credits ("IERC") to operate Hunters Point Unit 4 beyond 2005 is the responsibility of PG&E as the plant owner. In PG&E's direct testimony regarding the need for the Jefferson – Martin 230kV Transmission Project submitted to the Public Utilities Commission of the State of California, PG&E correctly acknowledged that the ISO would require PG&E to delay closure of Hunters Point until the Jefferson – Martin 230kV Transmission Project becomes operational.[2] Based on this testimony, it is the ISO's understanding that PG&E will take the required steps to secure the necessary IERCs to operate Hunters Point Unit 4 beyond 2005 should the need arise. The ISO believes this to be a prudent and necessary step to assure that San Francisco area reliability can be sufficiently maintained should the operation of Jefferson – Martin be unavoidably delayed.

On May 28, 2004 the ISO received a letter from Gavin Newsom, Mayor of San Francisco and Sophie Maxwell, Member of the Board of Supervisors asking for the ISO's continued assistance in helping the City plan for cleaner, more reliable and more efficient electric resources. The May 28, 2004 letter posed several

[2] Direct Testimony of Pacific Gas and Electric Company Regarding Need for the Jefferson-Martin 230 kV Transmission Project, A.02-09-043 (Oct. 10, 2003), at p. 85-86.

questions that relate to generation facilities at Hunters Point and Potrero. These questions are restated below in italics followed by the ISO's answer.

Q1a) *The City seeks a commitment by the ISO to release Hunters Point Units 1 and 4 from any RMR obligations no later than December 2005.*

A1a) As stated above, based on PG&E's commitment to successfully complete the 2003 Transmission Expansion Plan items outlined in their May 4, 2004 letter, the ISO is in agreement with PG&E concerning the retirement of Hunters Point Power Plant. Assuming that these facilities are in operation prior to the end of 2005 and the other critical assumptions listed above allow the ISO to discontinue renewing the RMR Agreement for Hunters Point, the ISO would not renew the RMR Agreement for Hunters Point Units 1 and 4 for 2006. It is anticipated that the ISO Board at its September 2005 meeting will make the final decision.

Q1b) *The City seeks confirmation from the ISO that it will release Hunters Point Units 1 and 4 from any RMR obligations on completion of the transmission projects identified in the attachment to PG&E's May 4, 2004 letter.*

A1b) See A1a.

Q1c) *The City seeks a commitment by the ISO to release Hunters Point Units 1 and 4 from any RMR obligations provided that three turbines are connected to the internal San Francisco 115 kV transmission network and the eight transmission projects identified in your October 22, 2003 letter (which excludes Jefferson–Martin) are completed.*

A1c) Assuming the installed capacity of the City's three new combustion turbines is 145 MW, the information stated in the ISO's October 22, 2003 letter to Supervisor Maxwell and the matrix provided to the City in February 2004, is correct through 2006. Providing the transmission projects identified in these documents are in operation prior to the end of 2005 and the other critical assumptions listed above allow the ISO to discontinue renewing the RMR Agreement for Hunters Point, the ISO would not renew the RMR Agreement for Hunters Point Units 1 and 4 for 2006. It is anticipated that the ISO Board at its September 2005 meeting will make the final decision.

Q2) *The City would like to ensure the closure of all existing generation at Potrero as soon as possible. PG&E's May 2, 2004 letter suggests that this should be possible in the near future. PG&E's May 2, 2004 letter indicates that with the Jefferson-Martin and other transmission project set forth in the attachment to the letter, only 200 MW of generation would be needed north of San Mateo substation. If this is correct, the ISO should be able to release all existing Potrero units from any RMR obligation once 1) Jefferson-Martin and the other transmission project identified by PG&E are completed, 2) Hunters Point is closed, and 3) three new turbines at Potrero and a fourth turbine at the Airport are placed in service. Please confirm that this is correct. If this is not correct, please 1) explains why not, 2) detail which units at Potrero Power Plant could be released of any RMR obligations in this scenario, and 3) describe what additional resources or load reduction would be required to provide for the release of all of the Potrero Power Plant units from any RMR obligations.*

?) As stated above and in the ISO's October 22, 2003 letter to Supervisor Maxwell, the ISO has not fully studied what grid enhancement would be necessary to enable the retirement of Potrero Unit 3.

Accordingly, the ISO is not prepared to provide an answer to this question at this time. However, the ISO recognizes the importance and significance the Potrero community and the City confers to the retirement of Potrero Unit 3 at the earliest possible time and remains committed to continue meeting with Potrero community group leaders to discuss the future need for Potrero 3. In order to address the lack of a plan to retire Potrero Unit 3 and in the spirit in which the ISO has committed to proactively work with the Potrero community group leaders, the ISO proposes to immediately begin working with the Potrero community group leaders, the City, and PG&E to develop a plan that would allow the ISO to discontinue renewing the RMR Agreement for Potrero Units 3, 4, 5, and 6 and that this effort be coordinated with the ongoing work that is currently being undertaken by the San Francisco Stakeholder Study Group.

I have endeavored to provide as complete an explanation as possible to the questions posed from all of you, at least based upon the information known today. As mentioned, we remain sincerely committed to work with you and affected communities to reach our mutual goal to obtain a reliable, affordable and environmentally responsible energy future. If you have any questions, please call Julie Gill at (916) 351-2221 or Gary DeShazo at (916) 608-5880.

Sincerely,

Jim Detmers
Vice President, Grid Operations
Acting Chief Operations Officer

Attachments

Cc:
Jesse Blout, City and County of San Francisco
Steve Huhman, Mirant
Armando J. Perez, ISO
Gary DeShazo, ISO
Julie Gill, ISO

Memorandum

To: ISO Board of Governors

From: Marcie Edwards, Interim CEO

cc: ISO Officers; Board Assistants

Date: September 10, 2004

Re: Action Plan for San Francisco, Options and Risks

This memorandum does not require Board action.

Purpose of Memo

This is in response to questions about the electric infrastructure of San Francisco that came up at the Board of Governor's July 29, 2004 meeting. This memo provides analysis and recommendations as to:

- The Action Plan for release of PG&E owned generation at Hunters Point and Mirant owned generation at Potrero from ISO Reliability Must Run (RMR) Agreements,
- An analysis of the retrofit of the Potrero 3 Power Plant with emissions control technology and how that impacts the Action Plan, and
- A discussion of the reliability of Hunters Point Unit 4 and the appropriateness of its designation as a RMR generation unit.

Action Plan to Release Hunters Point and Potrero from their RMR Agreements – An Action Plan acceptable to the ISO for release of the existing generation at Hunters Point and Potrero from RMR contracts involves successful completion of a total of 12 transmission projects by PG&E, four peaking power plants by the City, and the Mirant retrofit of Potrero 3 with emissions control technology for its temporary operation. The ISO does not control the dates of completion of these projects, nor does it control the permanent shutdown of the Hunters Point and Potrero generation.

The action plan acceptable to the ISO for the shut down of Hunters Point and Potrero units is based on assumptions that are subject to change. Such assumptions include current and expected status of transmission, generation, and customer demand. Any significant change to the assumptions underlying our analysis may change our conclusions. If such significant changes do occur, the ISO is obligated to review the continued acceptability of this action plan.

To release Hunters Point and Potrero Generation from their RMR Agreements requires the following:

- **Hunters Point 2 and 3**
  Completion of one transmission project – scheduled for completion by PG&E in December 2004. These units are recommended to be released from their RMR Agreements in September 2004 for the 2005 RMR Year.

- **Hunters Point 1 and 4**
  Completion of seven transmission projects and the retrofit of Potrero 3 – the final project (Jefferson – Martin) is scheduled for completion sometime between December 2005 and March 2006. Therefore, these units are planned to be recommended for release from the RMR Agreements in September 2005 for the 2006 RMR Year.
- **Potrero 4, 5, 6**
  Completion of Peaking Power Plants by City – the scheduled completion is December 2006. Therefore, these units are planned to be recommended for release from their RMR Agreements in September 2006 for the 2007 RMR Year.
- **Potrero 3**
  Completion of four transmission projects and assuming previous completion of the Peaking Power Plants referenced above – PG&E is currently evaluating the project completion dates, but believes they are likely to be scheduled for 2007. Were this to occur, the ISO would plan to recommend this unit for release from its RMR Agreement in September 2007 for the 2008 RMR year.

(See Attachment 1 for a list of the projects and Attachment 2 for a detailed discussion of the Action Plan.)

The Action Plan is based on compliance with regional and national requirements. Those standards also include the Greater Bay Area Generation Outage Standard adopted by the Board as a result of rolling blackouts initiated in the San Francisco Bay Area on June 14, 2000 to protect against the potential for voltage collapse.

Analysis of Retrofit of Potrero 3 with Emission Control Technology – The Action Plan for the release of all Hunters Point generation from RMR contracts assumes Potrero 3 is retrofitted with emission control technology. Potrero 3 would then operate cleaner until it can be released from its RMR contract, assuming all needed projects are completed. The retrofit, with an estimated cost in excess of $20 million (cost information provided by Mirant), is deemed necessary to ensure there is sufficient generation to serve customer load consistent with power system planning criteria. Further, the retrofit of Potrero 3 is viewed as a superior option when taking into consideration air quality and cost.

Timely completion of the retrofit is now in question - Potrero 3 is a 206 MW power plant. Without a retrofit, its air permit will limit its output to 140 MW provided its emissions are offset by cleaner emissions from other SCR retrofitted units owned by Mirant that are located within the NOx bubble. These units include Pittsburg Units 5 and 6 and Contra Costa Unit 7. Studies show that this "non-retrofit" option increases the costs to PG&E's ratepayers (an additional $30M per year) and increase NOx emissions (by up to 1,150%).

The Action Plan for release of Hunters Point currently includes the retrofit of Potrero 3. The "non-retrofit" alternative provides less of a cushion for continued reliable operation of the San Francisco grid and, as stated, will increase cost and emissions (See Attachment 3 and 4 for supporting discussion). Throughout these discussions, the ISO has communicated its position on the Potrero retrofit to all interested parties.

At the September 15, 2004 ISO Board of Governor's meeting, the Board will be asked to approve the slate of RMR units for the 2005 Year. As stated previously, staff is recommending that Hunters Point Units 1 & 4 continue as RMR units for the 2005 Year until the projects that support their removal from RMR status have

been completed. All units at Potrero are being recommended for RMR status for the 2005 Year as well, given that none of the projects to support their release have been completed.

In addition, note that in the 2005 RMR Board Action item, staff has recommended that Pittsburg 6 continue as RMR for the 2005 calendar year. This is to allow forward movement with the projects needed to ultimately release both Hunters Point and Potrero from RMR given the assumption that a retrofit of Potrero 3 might be delayed indefinitely. Understand that air quality limitations affecting Potrero 3 will cause the unit to be limited to 140 MW in 2005 and remote generators will be required to operate at their maximum in order to meet air quality limits. In order to keep the unit running under its new air quality limitations beyond 2005, Unit 3 will continue to be limited to 140 MW and remote generators will continue to be required to operate at their maximum in order to meet air quality limits. So, without the Potrero 3 retrofit, Option 2, (See Attachment 3) is the automatic default. Potrero generation, meaning the existing CT's and some portion of Unit 3 are needed in order to release Hunter's Point from their RMR agreements; a fact which the ISO has long made plain.

Reliance on Hunters Point Unit 4 to Maintain Reliability – This is in response to the Board inquiry into how the historical availability of a generating unit factors into the ISO RMR analysis.

The historical availability of a generating unit is not explicitly factored into the analysis. Instead, the RMR analysis assumes only one generating unit is out at any one time. So Hunters Point 4 is assumed available and operating when any other generating unit is not.

When there is a pool of generation that is available, we seek the selection of units that are the more reliable. However, all the generation in the City is needed, so we do not have the ability to be selective. Since 2000, the availability of Hunters Point 4 has been above 60% in all but one year.

ISO grid planning studies, RMR studies, and operational studies confirm that Hunters Point 1 & 4 and Potrero 3, 4, 5, and 6 are required in order for customers in SF and SF/Peninsula NOT to be subjected to possible blackouts in 2005 stemming from a violation of planning criteria. The ISO, therefore, will recommend the re-designation of Hunters Point 4 (as well as Hunters Point Unit 1 and the Potrero units) as 2005 RMR units.

Attachment 1

PG&E Transmission Projects, City Peaking Power Plants and Mirant Retrofit of Potrero 3 Necessary
To Meet NERC/WECC/CAISO Planning Requirements,

Project		Estimated Completion Date/Status	Issue	Resolution of Issue
Release Hunters Point Units 2 & 3 From Their RMR Agreements				
1	Potrero Static VAR Compensator	December 2004, Under Construction	NERC/WECC/CAISO Planning Standards	This project allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 2 and 3 released from their RMR Agreement
Release Hunters Point Units 1 & 4 From Their RMR Agreements				
2	San Mateo-Martin No. 4 Line Voltage Conversion	Completed	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
3	Ravenswood 2nd 230/115 kV Transformer Project	Completed	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
4	San Francisco Internal Cable Higher Emergency Ratings	Completed: To Be Used Upon Completion of the Jefferson-Martin 230kV Project	NERC/WECC/CAISO Planning Standards	These ratings are an interim solution that in combination with the other listed projects allows PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreements. In 2007, a third Martin-Hunters Point 115 kV cable will replace the emergency ratings.
5	Tesla-Newark No. 2 230 kV Line Reconductoring	May 2005, Construction in Progress	RMR Criteria	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
6	Ravenswood-Ames 115 kV Lines Reinforcement	May 2005, Engineering in Progress	RMR Criteria	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
7	San Mateo 230 kV Bus Insulator Replacement	May 2005, Engineering in Progress	Operations Requirement During San Mateo Bus Wash	Eliminate bus wash at San Mateo 230 kV bus will reduce the 400 MW generation operational requirement down to less than 200 MW
8	Potrero-Hunters Point (AP-1) 115 kV Cable	December 2005 Pending CPUC Permit Approval	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement

9	Jefferson-Martin 230 kV Line	December 2005 to March 2006	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
10	Potrero 3 SCR retrofit	February 2005	NERC/WECC/CAISO Planning Standards	This project ensures the availability of Potrero 3 at full capacity thereby reducing overall Greater Bay Area RMR requirements. This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreements
Release Potrero Units 4, 5, & 6 From Their RMR Agreements				
11	San Francisco Electric Reliability Project and San Francisco Airport Electric Reliability Plant	December 2006	NERC/WECC/CAISO Planning Standards	These projects will allow ISO/PG&E to meet planning requirements with Potrero 4, 5, and 6 released from their RMR Agreements
Release Potrero Unit 3 From Its RMR Agreement (assumes previous completion of Peaking Power Plants by the City)				
12	Upgrade the Newark-Dumbarton 115kV line	May 2006	NERC/WECC/CAISO Planning Standards	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet planning requirements with Potrero Unit 3 released from its RMR Agreement
13	Upgrade the Bair-Belmont 115kV Line	Under Evaluation By PG&E, likely to be scheduled for 2007	NERC/WECC/CAISO Planning Standards	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet planning requirements with Potrero Unit 3 released from its RMR Agreement
14	Upgrade the Metcalf-Hicks & Metcalf-Vasona 230 kV lines	Under Evaluation By PG&E, likely to be scheduled for 2007	NERC/WECC/CAISO Planning Standards	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet planning requirements with Potrero Unit 3 released from its RMR Agreement
15	Add voltage support at Ravenswood substation	Under Evaluation By PG&E, likely to be scheduled for 2007	NERC/WECC/CAISO Planning Standards	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet planning requirements with Potrero Unit 3 released from its RMR Agreement

Attachment 2

Action Plan for Release of Existing Hunters Point and Potrero Generation from RMR Contracts

Background

The mission of the California Independent System Operator (ISO) is to plan and operate the ISO control area safely and reliably. The ISO sets its reliability standards in compliance with regional and national requirements (Western Electricity Coordinating Council and North American Electric Reliability Council, respectively). We also apply standards that have been developed by the California ISO Planning Standards Committee for application to the ISO control area. The ultimate goal of these standards is to ensure continuous supply of electricity and to avert the risk of blackouts.

The ability to reliably provide electricity to the San Francisco Peninsula Area[1] is based on three critical "load serving" conditions:

1. There is sufficient power to serve the electric needs of customers in local areas;
2. The transmission system is capable of delivering that power to the local area where it is distributed to customers;
3. Power System operators can perform routine equipment maintenance and continue to reliably serve customers even after certain equipment failures occur.

The Action Plan to release existing Hunters Point and Potrero generation from RMR contracts identifies the transmission and generation infrastructure necessary to meet the applicable national, regional, and ISO reliability standards. The dates set forth in this memo are based on expected completion dates and were provided by Pacific Gas and Electric Company (PG&E), the City and County of San Francisco (City) and Mirant who are the entities responsible for completing the transmission and generation projects. PG&E and Mirant are the owners of Hunters Point and Potrero Power Plants, respectively, and control the subsequent shutdown of the power plants.

In 1998, the City entered into an agreement with PG&E to close the Hunters Point Power Plant (Hunters Point) as soon as it is released from the Reliability Must Run Agreement (RMR Agreement). To that end, in approving the Jefferson Martin transmission line, the ISO Board of Governors provided the directive to the ISO to work with the City and County of San Francisco and interested stakeholders with the goal of closing Hunters Point.

Over the past several years and continuing here, the ISO is fulfilling its mission by working with representatives of the City, PG&E, and the Potrero and Hunters Point/Bayshore communities to facilitate appropriate investment in electric transmission and generation infrastructure that will maintain the reliability of the electric system while they pursue the shutdown of existing generation within the City.

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[1] In the testimony for the Jefferson-Martin Transmission Line, approved by the California Public Utilities Commission on August 19, 2004, the ISO refers to the City and County of San Francisco and the San Francisco Peninsula as the "San Francisco Peninsula Area." For clarity in this memo, the ISO will delineate separately, when necessary, the City, the Peninsula, and the Greater Bay Area even though the City is included in the Peninsula, which is included in the Greater Bay Area.

PG&E and the ISO jointly developed the list of reliability upgrades needed to establish a clear transmission plan to release all of Hunters Point generation from RMR contracts (refer to Attachment 1). It is important to note that the ISO cannot decommission the generation facilities; the ISO will release the Units from their RMR Agreements and PG&E as the plant owner is responsible for the decommissioning process.

Hunters Point Detail

By the end of 2004, PG&E will have completed the one project necessary to allow the release of Hunters Point Units 2 & 3 from their RMR Agreements. The project is the Potrero Static VAR Compensator that will provide enough voltage support for the San Francisco Peninsula Area to displace the need to continue operating Hunters Point Units 2 & 3, which are currently operated as synchronous condensers. However, ISO management will request the re-designation of Hunters Point Units 1 & 4 for the 2005 Contract Year, given that the projects to support the removal of the RMR agreement are not yet completed.

The release of Hunters Point 1 & 4 from RMR obligations are conditioned on completion of the noted transmission projects and the retrofit of Potrero 3. PG&E has continued to move towards completing all of their transmission projects by the end of 2005. And with the recent approval of the Jefferson – Martin 230kV line by the CPUC, the way has been cleared for the last remaining piece of transmission infrastructure to be in-service by the end of 2005 or the first quarter of 2006. Therefore, the continued operation of Hunters Point Units 1 & 4 through 2005 is necessary to serve customer demand for power and provide operational support until those transmission projects are completed. The ISO's current plan is to recommend that the ISO Board of Governors release Hunters Point Units 1 & 4 from their RMR agreements at the September 2005 Board meeting for the 2006 Contract Year.

Potrero Detail

The ISO has determined that generation located in the City will remain critical to the long-term ability to serve load in the San Francisco Peninsula Area. Therefore, following the retirement of Hunters Point, the retirement of any existing Potrero generation requires an equivalent offset of new transmission and/or generation infrastructure. The only new generation currently being proposed is by the City through their San Francisco Electric Reliability Project (SFERP) and the San Francisco Airport Electric Reliability Plant (SFAERP). The SFERP proposes to install three new 48 MW combustion turbines at the existing Potrero Power Plant site and the SFAERP proposes to install one 48 MW combustion turbine at the San Francisco International Airport. The City proposes to have these two projects (collectively the "CT Project") in-service by the end of 2006. Completion of the San Francisco Electric Reliability Project will allow for the release of Potrero Units 4, 5, and 6 from RMR obligations. The current plan is to recommend that the ISO Board of Governors release Potrero 4, 5, and 6 from their RMR agreements at the September 2006 Board meeting for the 2007 Contract Year.

PG&E and ISO have tentatively agreed to evaluate additional transmission projects and the addition of voltage support to achieve the release of Potrero 3 from its RMR obligations. The completion date of these projects is to be determined, but PG&E indicates they are likely to be scheduled for 2007. We will continue to keep the Board of Governors appraised of the progress of this effort. As with the release of other projects from RMR obligations, we expect to release Potrero 3 when the last of these projects are completed.

DC Cable Detail

A High Voltage Direct Current line (DC Cable) capable of carrying 400-600 MW has been proposed by Trans Bay Cable LLC (an affiliate of Babcock & Brown LP). This DC Cable would run between the City of

Pittsburg and the Potrero Substation in San Francisco. This DC Cable is tentatively scheduled for operation by summer 2008. At this time, the proposed DC Cable is an alternative to augment long-term load serving capability for the San Francisco Peninsula area. In deciding on a preferred long-term alternative to serve load beyond 2007, the reliability and economic aspects of the proposed project will be considered and compared to PG&E reinforcing the existing transmission system or building a new 230 kV line to increase power imported into the San Francisco Peninsula.

Attachment 3

Analysis of Options to the Retrofit of Potrero 3

(Based on current ISO 2005 RMR analysis which includes Hunters Point Units 1 & 4)

- **Option 1: Potrero 3 available; retrofitted (ISO Preferred Approach)**
  - Load shedding exposure: None
  - RMR Exposure
    - Release Pittsburg 6 (clean and expensive)
    - Release Pittsburg 7 (dirty and expensive)
  - Operational exposure
    - Increased use of other generating facilities (clean and less expensive than Pittsburg 6)
  - Cost exposure
    - Information released by Mirant puts the retrofit costs at approximately $20M.
  - Environmental exposure
    - The emissions from Potrero Unit 3 are reduced by 80% (reduction of one ton NOx/day). In other words, a retrofitted Potrero 3 only emits 15 lbs/hour

- **Option 2: Potrero 3 available; not retrofitted; operated at reduced level.**
  - Load shedding exposure: None
  - RMR exposure
    - Continue to RMR Pittsburg 6 (clean and expensive)
    - Simultaneously run Pittsburg 5 & 6 and Contra Costa 7 at their maximum in order to operate Potrero 3 up to 140 MW (Overall NOx bubble requirement)
  - Operating exposure
    - Reduced use of remote generating resources that are cleaner and less expensive than Pittsburg 6, given that the Pittsburg 5 & 6 and Contra Costa 7 must run as RMR units. In short, other less expensive/cleaner options will have to be backed down.
  - Cost exposure
    - Additional $30,000,000/year (additional RMR costs incurred by retaining units under RMR that would have otherwise been released if Potrero 3 was retrofit.)
  - Environmental exposure
    - Total lbs/hour of NOx increase by 108 to172 lbs/hour or from 700% to 1,150% over Option 1 emissions

- **Option 3: Potrero 3 not available (Note: This option violates planning criteria and is provided simply to outline the associated risks.)**
    - Load exposure
        - San Francisco Peninsula Area load shedding could be required; up to 50 to 100 MW
        - Up to 30-70 hours per year
    - RMR Exposure
        - Continue to RMR Pittsburg 7 (dirty and expensive)
        - Continue to RMR Pittsburg 6 (clean and expensive)
    - Cost Exposure
        - Additional cost of $100,000,000 - $120,000,000/year (additional RMR costs incurred by retaining units under RMR that would have otherwise been released if Potrero 3 was retrofit.)
    - Operating exposure
        - Does not meet NERC/WECC or MORC Standards
        - Simultaneously run Pittsburg 5 & 6 and Contra Costa 7 at their maximum in order to operate Pittsburg 7 (Overall NOx bubble requirement)
        - Reduced use of other generation (clean & less expensive than Pittsburg 6)
    - Environmental exposure
        - Total lbs/hour of NOx increase by 175 to 239 lbs/hour or 1,166% to 1,593% over Option 1 emissions.

Attachment 4

Discussion of the Potrero 3 Retrofit

Key Study Assumptions in Creating a Potrero Retirement Plan
The retrofit of Potrero 3 continues to be part of the Action Plan to release Hunters Point from its RMR contract. The retrofit is to install emission control technology that will allow the unit to operate at its current 207 MW capacity. Potrero 3 will operate cleaner until it is shut down after the projects listed in Attachment 1 are completed.

The ISO was asked to evaluate the release of Hunters Point from its RMR obligations in early 2003. We responded in a letter to the City dated April 18, 2003 that outlined a plan for the retirement of Hunters Point 4 and identified the Potrero 3 retrofit as part of the plan. We have reiterated our support for the retrofit in subsequent 2003 and 2004 correspondence. We also encouraged the timely completion of the City's combustion turbine project, the Jefferson-Martin transmission project, and other PG&E transmission projects.

Since our initial discussions, PG&E's Jefferson-Martin transmission project and the City's combustion turbine project have been delayed to early and late 2006, respectively. A description of the legal challenges to the Potrero retrofit follows.

Challenge to Potrero Retrofit
On July 14, 2004, an appeal was filed with the San Francisco Board of Appeals challenging the granting of permits by the Planning and Building Departments that are necessary for the retrofit of Potrero Unit 3. The filing of an appeal in San Francisco stays the permit, and Mirant has been unable to proceed with any work on their retrofit. This has changed the outage schedule for this unit and alters the sequenced and interdependent outages coordinated in this area for both generation and transmission. In addition, a lawsuit has been filed at the San Francisco Superior Court on September 2, 2004, challenging the Bay Area Air Quality Management District's approval of the SCR for Potrero Unit 3. These actions have already delayed the retrofit of Potrero Unit 3 at a minimum, and could result in Potrero Unit 3 not being retrofitted as originally contemplated in the ISO's previous plans. In order to proceed with the analysis, staff felt that several alternative approaches must be assessed to outline for the Board the available options and the consequences associated with the operation of Potrero Unit 3 both with and without the retrofit. Following is a discussion of the options in detail (Attachment 3).

Operation of Potrero Unit 3 With and Without the Retrofit for 2005
Anticipating that the retrofit of Potrero Unit 3 could not be achieved in 2005, ISO Staff has assessed the opportunity to continue to operate Potrero Unit 3 without the proposed SCR retrofit. The continued operation of Potrero Unit 3 without an SCR retrofit is possible, provided its emissions are offset by cleaner emissions from other SCR retrofitted Mirant units located within the Bay Area NOx bubble. At present, Mirant owns Potrero as well as generation units at Pittsburg and Contra Costa. Pittsburg Units 5 and 6 and Contra Costa Unit 7 have already been SCR retrofitted and more than meet the NOx requirements for 2005 and beyond. Potrero Unit 3 could continue to be operated at a reduced level of 140 MW, provided

Pittsburg Units 5 and 6 and Contra Costa Unit 7 are run concurrently to meet Mirant's overall Bay Area NOx limit requirement. With Mirant running the Pittsburg and Contra Costa units that have combined emissions less than allowed by the 2005 standard, "room" within the NOx Bubble is created to operate Potrero Unit 3 at a reduced level. This level of generation is projected to be sufficient to meet San Francisco Peninsula Area reliability requirements in 2005, provided Hunters Point Units 1 and 4 remain available through 2005 or until all the identified transmission projects are placed in-service.

Release of Potrero Units 4, 5, and 6 from the RMR Agreement

The ISO has determined that generation located in the City will remain critical to the long-term ability to provide the capacity and energy needed to serve load in the San Francisco Peninsula Area. Therefore, following the retirement of Hunters Point, the retirement of any existing Potrero generation requires an equivalent offset of new transmission and/or generation infrastructure. The only new generation currently being proposed is by the City through their San Francisco Electric Reliability Project (SFERP) and the San Francisco Airport Electric Reliability Plant (SFAERP). The SFERP proposes to install three new 48 MW combustion turbines at the existing Potrero Power Plant site and the SFAERP proposes to install one 48 MW combustion turbine at the San Francisco International Airport. The City proposes to have these two projects (collectively the "CT Project") in-service by the end of 2006. The ISO has determined that the CT Project will provide the needed capacity and energy required to replace the older Potrero combustion turbine units and to continue the forward movement needed to ultimately release Potrero Unit 3 from its RMR Agreements. Therefore, once the CT Project is placed in-service, the ISO will release Potrero Units 4, 5, and 6 from their RMR Agreement.

Release of Potrero Unit 3 From the RMR Agreement

At the present time, the ISO assumes that the City's electric reliability projects will replace the existing Potrero combustion turbine Units 4, 5, and 6. Unfortunately, the load serving capability that the City's generation projects provide to the San Francisco Peninsula Area is approximately 40 MW greater than the 150 MW of existing combustion turbine generation it replaces, falling short of the Area's projected electric growth that is expected to occur during this time frame if Potrero Unit 3 were also retired[2]. As such, additional transmission facilities beyond those already identified for retiring Hunters Point are needed to not only make up this shortfall, but also provide additional load serving capacity many years into the future.

ISO Staff supports transmission system reinforcements to allow for reliable electric system operation with the Potrero Unit 3 released from its RMR contract. This involves reinforcement of the existing transmission system through mitigating certain transmission line overloads that are projected to occur under contingency conditions and adding the necessary voltage support to account for the impacts of increased imported power into San Francisco. The transmission overloads that need to be addressed before Potrero Unit 3 can be retired are listed in Attachment 1. ISO Staff has discussed these transmission overloads with PG&E and requested them to assess and determine the appropriate transmission projects for relieving them. Until PG&E has had an opportunity to conduct an in-depth review, these transmission needs and their corresponding transmission projects, identifiable in-service dates cannot be accurately determined; however, PG&E indicates that they are likely to be scheduled for 2007. PG&E has agreed to include all of these upgrades in their 2005 transmission expansion assessment.

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[2] San Francisco reached a new peak on September 7, 2004 of 931 MW. This number represents the peak forecast for 2006 (936 MW) and it is already being reached in 2004.

Notwithstanding PG&E's final review of these transmission requirements, the ISO hopes that the necessary transmission upgrades could be in place as soon as possible to allow for the retirement of Potrero Unit 3 at the earliest possible time. To this end, the ISO remains committed to a continued and positive working relationship with PG&E towards the timely completion of these necessary transmission upgrades.

Attachment 5

What is RMR, and Why are Hunters Point and Potrero Units Under RMR Contracts

Over the years, many generation and transmission expansion projects were built to serve the increasing consumer load growth. These projects were integrated with the facilities that preceded them. In many cases, certain generation-related components, in whole or in part, complement transmission-related components. For example, generation-related components complement the transmission grid in several ways; providing voltage support, reducing heavy power flows on certain transmission lines, and minimizing the oscillatory nature of the electric system, among others. In these situations, generation and transmission facilities are interdependent in maintaining grid reliability such that changes in either could have a detrimental impact on the acceptable performance and operation of the interconnected transmission grid.

Prior to the restructuring of the electricity market in California, generation was owned and operated by the investor owned utilities and was operated as an integral part of the utilities interconnected transmission grid in a manner to reliably serve their load. Because some generation is located in critical local areas, its dispatch was required, sometimes uneconomically, to meet the system's reliability needs. California's restructured electric market allowed for the majority of the generation owned by investor owned utilities to be sold to third parties. With this change in ownership, generator owners were not obligated to run their generator units in this manner and the CAISO did not have the ability to achieve this must-run requirement without a contracted requirement. As a result of this change, Reliability Must Run ("RMR") was established where generation can be dispatched by the CAISO to primarily assure local area reliability needs are met and local area load can be reliably served[3] and secondly to mitigate the local market power that owners can exercise. In short, an RMR designation of any generation facility is to simply say that a set of power system conditions can exist in a particular geographic area that can only be remedied by localized support from a specific generator.

The San Francisco Peninsula Area is a local area Reliability Must-Run sub-area that is considered in the ISO's annual RMR assessment. This is a sub-area within the Greater Bay Area local RMR area. The San Francisco Peninsula Area is generally represented by PG&E's service territory running north from Ravenswood substation (in the vicinity of the City of Palo Alto) and including the City and County of San Francisco ("San Francisco"). The ability to serve electric load in this area is impacted by not only generation and transmission facilities within this area, but also transmission facilities connecting from the Greater Bay Area.

Two key generation facilities for serving load within the San Francisco Peninsula, Hunters Point and Potrero, are located within the city of San Francisco. They are currently under RMR contract for 2004 and are being re-designated for an RMR contract for 2005. For 2004, RMR generation at Hunters Point and

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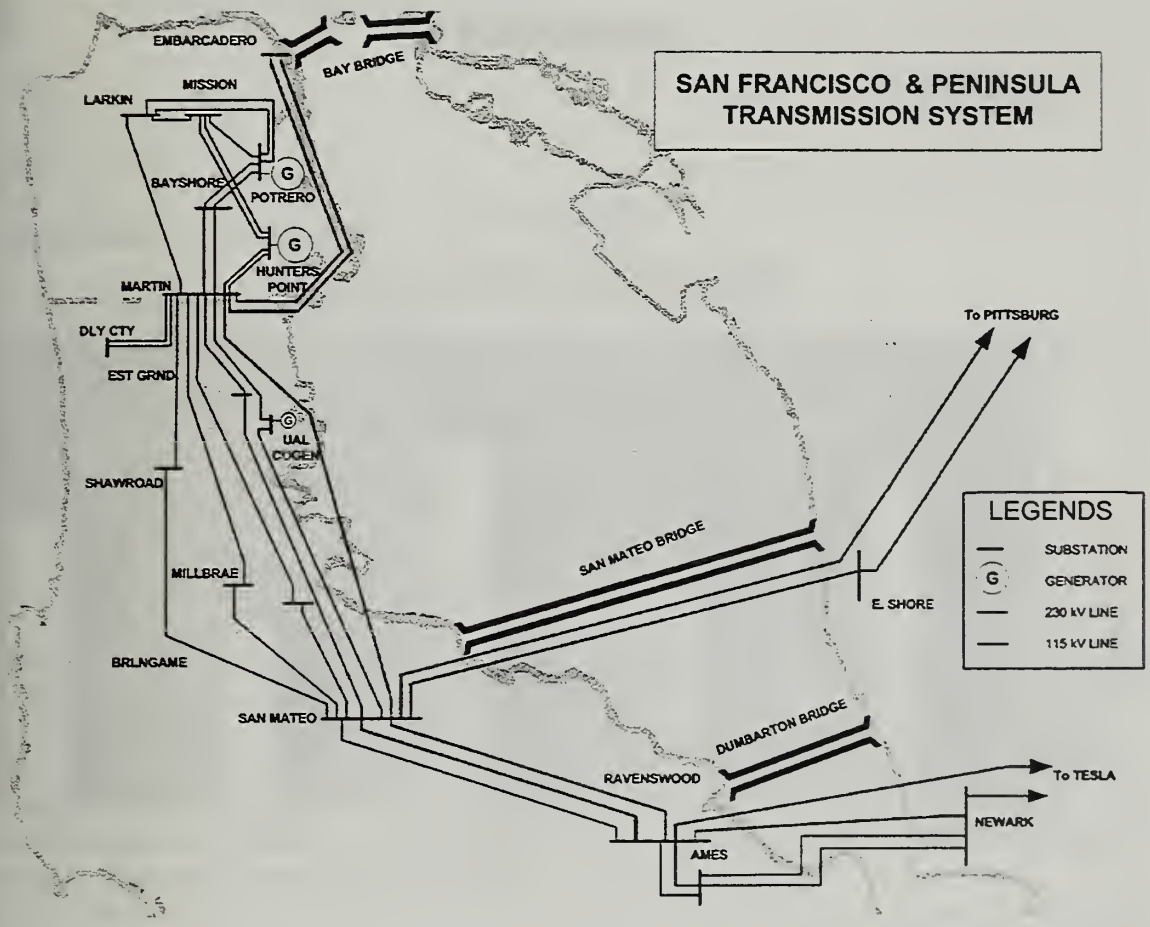
[3] **Reliability Must-Run Generation** - Generation that the ISO determines is required to be on line to meet Applicable Reliability Criteria requirements. This includes i) Generation constrained on line to meet NERC and WECC reliability criteria for interconnected systems operation; ii) Generation needed to meet Load demand in constrained areas; and iii) Generation needed to be operated to provide voltage or security support of the ISO or a local area.

Potrero is mainly determined by an outage of the Tesla – Metcalf 500kV line and the Delta Energy Center. The system limitation that determines the amount of RMR generation is the resulting loading on the Tesla – Newark #2 230kV line. As a result of the 2004 RMR designation, PG&E proposed to upgrade the Tesla – Newark #2 230kV line to mitigate this overload and to assist in addressing the need to RMR generation at Hunters Point. The ISO accepted PG&E's proposal and PG&E included the project in their 2004 Transmission Expansion Plan as a transmission RMR project for completion by May 1, 2005.

The 2005 RMR process has been completed and ISO staff will again recommend the re-designation of all generator units at Hunters Point and Potrero Power Plants except Hunters Point Units #2 & #3. Units #2 & #3 have been operating as synchronous condensers for the last three years where they have only been supplying needed voltage support. They will be replaced by a Static Var Compensator currently under construction at Potrero Substation and scheduled for operation in December 2004. For 2005, the amount of required RMR generation for San Francisco is determined by an outage of the Newark – Ravenswood 230kV line and Potrero Unit 3. The system limitation that determines the amount of required RMR generation is the loading on the Newark – Ames 115kV lines. These lines are part of the 230 and 115 kV lines over which power is imported into the San Francisco Peninsula area.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SHAWROAD
MILLBRAE
BRLNGAME
SAN MATEO
SAN MATEO BRIDGE
E. SHORE
To PITTSBURG
DUMBARTON BRIDGE
RAVENSWOOD
To TESLA
NEWARK
AMES
LEGENDS
SUBSTATION
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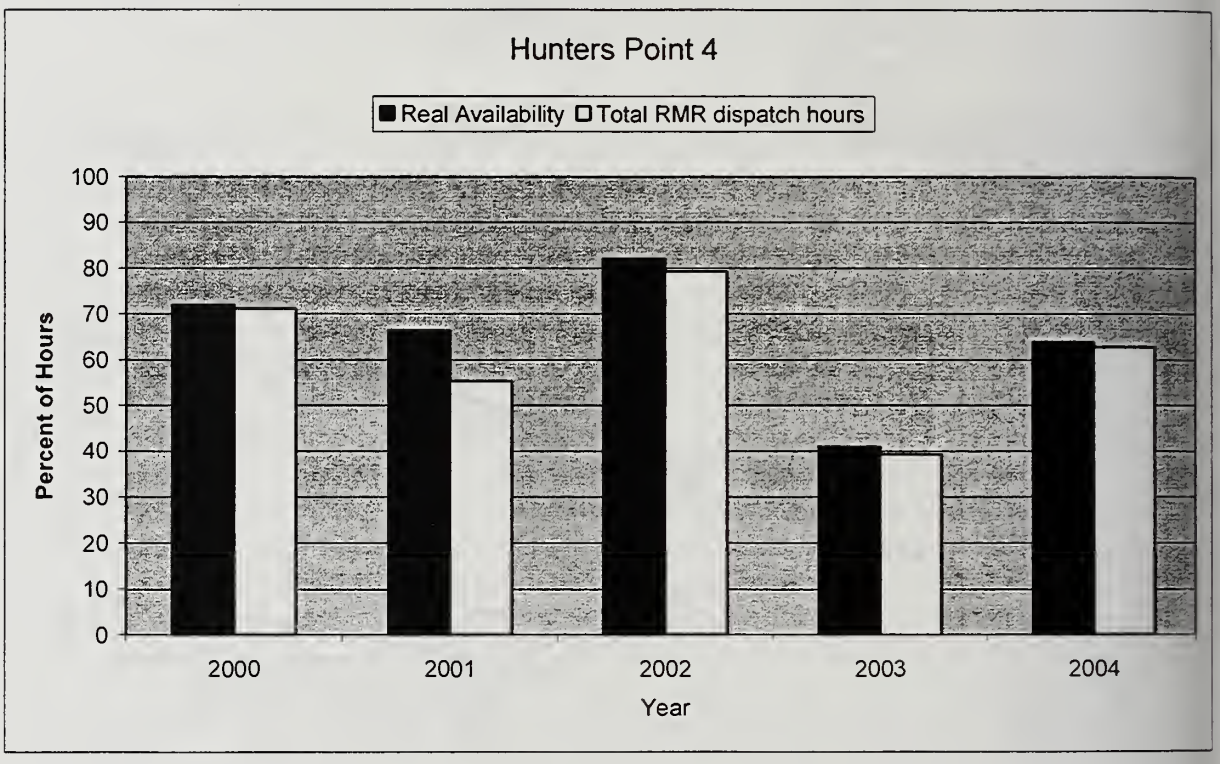
GENERATOR
230 kV LINE
115 kV LINE

Attachment 6



Based on past maintenance records, PG&E has already overhauled the boiler, generator (rotor) and low-pressure turbine and modified and tuned the NOx emission controls. These items required long periods of downtime for the unit and contributed to the low availability of this unit in the past. One could conclude that the unit's availability outlook for 2005 should be better then average (>65%) since most of the major items are now in good shape.

In the past the ISO has used very few RMR starts for this unit (0-5 per year). When available this unit is dispatched to maintain the reliability of the local area. Limiting the starts protects the area residents from high emission pollutants during start-up.

CALIFORNIA ISO

Attachment 2

October 27, 2004

Via Facsimile and US Mail Delivery

The Honorable Mayor Gavin Newsom
The Honorable Supervisor Sophenia Maxwell
The Honorable City Attorney Dennis Herrera
City and County of San Francisco
City Hall
One Carlton B. Goodlett Place
San Francisco, CA 94102

RE: September 14, 2004 Letter to Marcie Edwards, California ISO Interim CEO

Thank you for your expression of appreciation for the efforts of the California Independent System Operator (ISO) to provide an Action Plan that will release all existing in-City generation from their Reliability Must Run (RMR) Agreements. I am pleased you find the Action Plan a significant step toward achieving the mutual interests of the City of San Francisco (City), its constituents, and the California ISO. I appreciate the leadership and support you and your staff has shown for new generation and transmission infrastructure in San Francisco. As such, the ISO views the City peaking power plants as an integral part of the Action Plan and continued reliability of the San Francisco power supply.

This letter is in response to the subject letter and comments made by Deputy City Attorney Theresa Mueller during the September 15, 2004 ISO Board of Governors meeting. In addition to answering your questions, we have provided our assessment of some of the areas of risk that load serving entities and policy makers should consider when planning for their energy future. I expect that you will find this response helpful as you balance the myriad interests of San Francisco.

Potrero 3 Retrofit: The ISO remains prepared to release Hunters Point 1 & 4 from the RMR Agreement once Jefferson-Martin and the eight previously defined transmission projects are in place. As we have described in all of our planning documents on this issue, Potrero 3 must be available to provide energy in order to allow for the release of Hunters Point generation. Potrero Unit 3 can operate in two ways. The first is with the environmental retrofit that will allow the unit to operate cleaner, more reliably, and produce more energy. However, the second way is without the retrofit, which will allow the unit to operate, but at a lower output level, greater pollution impact to the Greater Bay Area, higher cost to PG&E ratepayers, and an overall lower level of reliability to the San Francisco Peninsula Area. Due to the retrofit of Potrero 3 being in jeopardy, we have initiated steps to implement the non-retrofit alternative. This being said, we continue to prefer the retrofit of Potrero 3 because the non-retrofit alternative creates a greater zone of risk to the reliability of the area. The energy represented between the two alternatives is approximately 70 MWs that allows for the local area to be operated above the reliability requirements. This enhances the ability to reliably serve load and provides greater operational flexibility.

Release of Potrero 3 from RMR Agreement: As requested and then studied, the Action Plan has been revised to allow the release of Potrero 3 power plant before the release of Potrero 4, 5, and 6 from the RMR Agreement. This determination assumes that the City peaking power plants are interconnected at Potrero and licensed to operate 4,000 hours at full output, as indicated by their application for construction. We understand that other sites are being considered for the City peaking power plants. If the City peaking power plant installation location and/or the interconnection point is revised or the operating hours are reduced, further study would be required and could jeopardize our original Action Plan to release existing San Francisco generation from the RMR Agreements. Attached is the table originally presented to the ISO Board of Governors revised to show the change in sequence of release from the RMR Agreement of Potrero Unit 3 with Potrero Units 4, 5, and 6 (Attachment 1). As promised, the forecasted load growth and the capability of the infrastructure assumed in the Action Plan are attached for your reference (Attachment 2).

As much as the Action Plan is intended to provide a bright line, it must allow for adjustments if the carefully sequenced projects slip or if we find that the load growth exceeds both those assumed in the planning analyses and the capability of the infrastructure itself. The Action Plan was provided on an expedited basis and does not benefit from the customary peer review such significant system changes typically receive. We are confident that the Action Plan complies with the reliability standards and will continue to analyze system conditions to verify the sustained compliance. This continuous monitoring of system conditions is also customary and will help avoid any surprises or unanticipated circumstances to occur that would jeopardize the Action Plan.

Risk Assessment: As we all understand, the consideration of risk is an integral component for policy makers as they make determinations affecting the energy future of a critical load center such as San Francisco. The ISO remains committed to the Action Plan; however, the implementation of this Plan results in a fundamental shift in how load in San Francisco will be served in the future and is not without some risk. Per the Action Plan, there will be a net removal of over 300 MW of generation in this local area. Importing remote generation into San Francisco through the underlying transmission infrastructure will make up this difference. Although this meets the required reliability standards, it does decrease the overall flexibility that the operators have at their disposal to manage unforeseen emergencies (Attachment 3).

In closing, we consider this Action Plan as one step in achieving the broader and long-term energy plan goals of San Francisco. The ISO commits to work with the City, PG&E, and all interested stakeholders as you identify future infrastructure projects that will be required to meet the electric demands of the City's businesses and families.

Sincerely,

ORIGINAL SIGNED BY

Marcie L. Edwards
Interim Chief Executive Officer

ATTACHMENT 1 – Revised Action Plan
ATTACHMENT 2 – Load Forecast/Load Serving Capability Chart
ATTACHMENT 3 – Risk Assessment

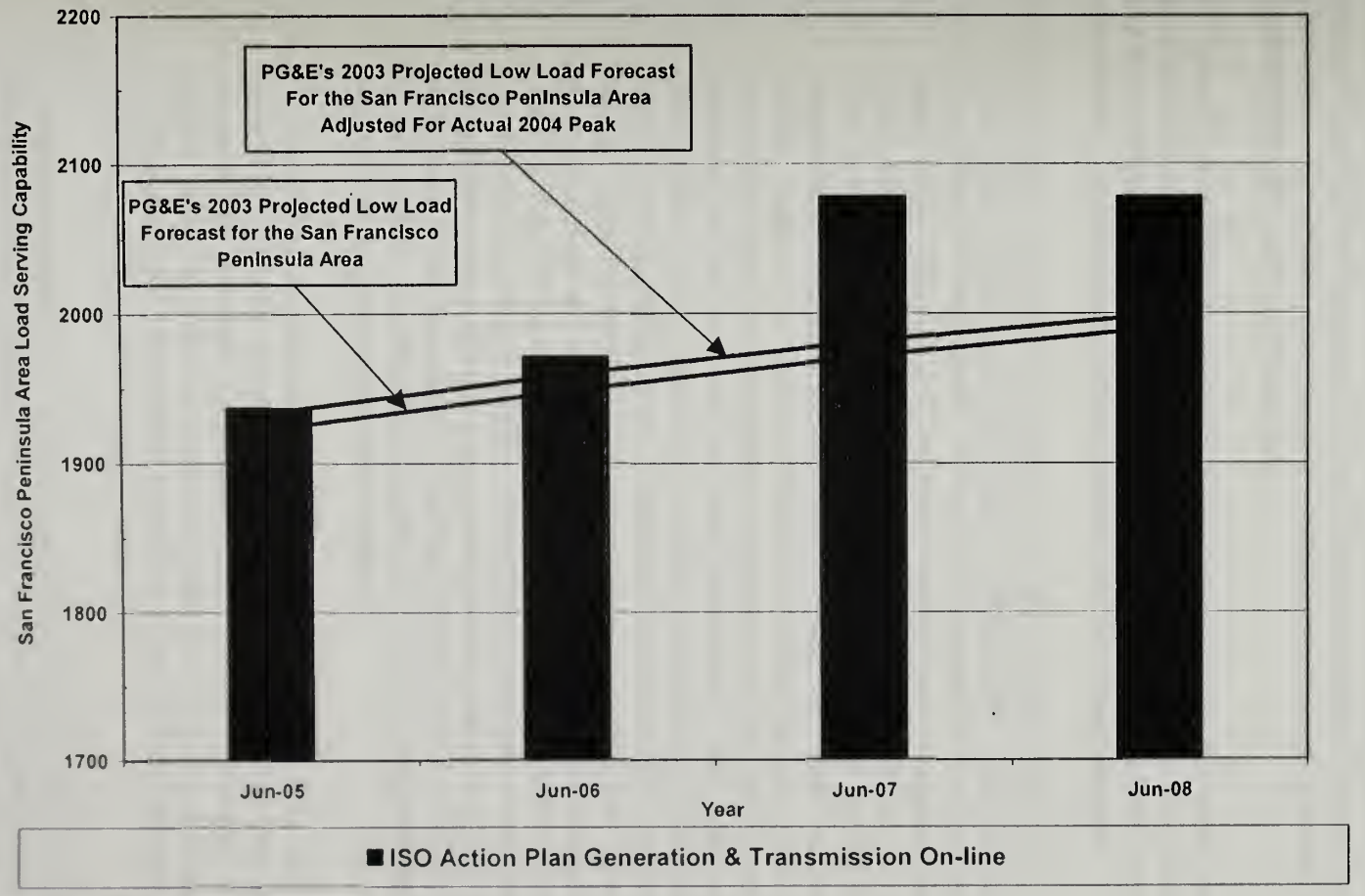
Cc: Michael Kahn
Mike Florio
Tim Gage
Ed Cazalet
Ken Wiseman
Randy Abernathy
Charles Robinson
Jim Detmers
Armando Perez
Gary DeShazo
Julietta Gill
Joseph Desmond

PG&E Transmission Projects, City Peaking Power Plants and Mirant Retrofit of Potrero 3 Necessary To Meet NERC/WECC/CAISO Planning Requirements

	Project	*Estimated Completion Date/Status*	*Issue*	**Resolution of Issue**
Release Hunters Point Units 2 & 3 From Their RMR Agreements				
1	Potrero Static VAR Compensator	December 2004, Under Construction	NERC/WECC/CAISO Planning Standards	This project allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 2 and 3 released from their RMR Agreement
Release Hunters Point Units 1 & 4 From Their RMR Agreements				
2	San Mateo-Martin No. 4 Line Voltage Conversion	Completed	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
3	Ravenswood 2nd 230/115 kV Transformer Project	Completed	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
4	San Francisco Internal Cable Higher Emergency Ratings	Completed: To Be Used Upon Completion of the Jefferson-Martin 230kV Project	NERC/WECC/CAISO Planning Standards	These ratings are an interim solution that in combination with the other listed projects allows PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreements. In 2007, a third Martin-Hunters Point 115 kV cable will replace the emergency ratings.
5	Tesla-Newark No. 2 230 kV Line Reconductoring	May 2005, Construction in Progress	RMR Criteria	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
6	Ravenswood-Ames 115 kV Lines Reinforcement	May 2005, Engineering in Progress	RMR Criteria	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
7	San Mateo 230 kV Bus Insulator Replacement	May 2005, Engineering in Progress	Operations Requirement During San Mateo Bus Wash	Eliminate bus wash at San Mateo 230 kV bus will reduce the 400 MW generation operational requirement down to less than 200 MW
8	Potrero-Hunters Point (AP-1) 115 kV Cable	December 2005 Pending CPUC	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power

		Permit Approval		Plant Units 1 and 4 released from their RMR Agreement
9	Jefferson-Martin 230 kV Line	December 2005 to March 2006	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
10	Potrero 3 SCR retrofit	Permit Authority Under Appeal	NERC/WECC/CAISO Planning Standards	This project ensures the availability of Potrero 3 at full capacity thereby reducing overall Greater Bay Area RMR requirements. This project or the reduced capacity available without the retrofit in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreements
Release Potrero Unit 3 From Its RMR Agreement				
11	San Francisco Electric Reliability Project and San Francisco Airport Electric Reliability Plant	December 2006	NERC/WECC/CAISO Planning Standards	These projects will allow ISO/PG&E to meet planning requirements with Potrero 4, 5, and 6 released from their RMR Agreements
Release Potrero Units 4, 5, & 6 From Their RMR Agreements (assumes previous completion of Peaking Power Plants by the City)				
12	Upgrade the Newark-Dumbarton 115kV line	May 2006	NERC/WECC/CAISO Planning Standards	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet planning requirements with Potrero Unit 3 released from its RMR Agreement
13	Upgrade the Bair-Belmont 115kV Line	Under Evaluation By PG&E, likely to be scheduled for 2007	NERC/WECC/CAISO Planning Standards	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet planning requirements with Potrero Unit 3 released from its RMR Agreement
14	Upgrade the Metcalf-Hicks & Metcalf-Vasona 230 kV lines	Under Evaluation By PG&E, likely to be scheduled for 2007	NERC/WECC/CAISO Planning Standards	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet planning requirements with Potrero Unit 3 released from its RMR Agreement
15	Add voltage support at Ravenswood substation	Under Evaluation By PG&E, likely to be scheduled for 2007	NERC/WECC/CAISO Planning Standards	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet planning requirements with Potrero Unit 3 released from its RMR Agreement

Attachment 2
San Francisco Peninsula Area Load Serving Capability
Based On the Revised Action Plan



Note: The columns represent the aggregate capability to serve load in the San Francisco Peninsula Area
ISO Grid Planning 10/18/2004

Attachment 3

Zones of discretionary risk associated with energy planning for the San Francisco Peninsula

Via the Action Plan, the ISO has outlined a sequence of transmission and generation additions that will permit the release of Hunters Point and Potrero Generation from their RMR Agreements. The Action Plan meets all established reliability planning criteria using the best information currently available.

However, it should be noted that the Action Plan meets only the *minimum* standards, and is therefore not without some risk. Therefore, in order to assist San Francisco in its overall long term planning effort, the ISO has attempted to quantify those zones of risk that San Francisco should consider when planning for their energy future.

The following are items to consider in assessing the level of acceptable risk:

- The original design and subsequent configuration of the power system in San Francisco was based on more local generation versus imported generation. The Action Plan moves away from the original design in the area, and therefore creates greater dependency on imported energy. This increased dependency translates into understanding that a loss of a transmission circuit(s) supplying the SF area may result in customer power outages in situations wherein the remaining amount of local generation may be insufficient to eliminate. In short, the customer demand on the Peninsula at a peak load period is estimated at 1,970 MW in 2007. Local generation, assuming full use of the planned City peaking power plants, without both Hunters Point and Potrero, and assuming all the transmission enhancements outlined in the action plan are completed, will be approximately 192 MW. The difference (nearly 1,800 MW) is the amount upon which the peninsula will be dependent upon the transmission system. Risks are potentially small that multiple transmission outages will occur during peak periods, but it should be understood that choosing to minimize the amount of local generation thereby minimizes the choices available during emergency conditions such as loss of a transmission circuit(s).

- The reality of all generation is that at one point or another the units will trip off-line or break down. Again, without having more local generation immediately available, dependency on imports is increased. In other words, while the minimum planning criteria will have been met, the loss of the associated operational flexibility carries risk under peak load/multiple equipment outage scenarios.

- Greater dependency on external generation as opposed to local generation also carries with it a greater risk in areas that are prone to natural disasters. Natural disasters such as earthquakes, fires, and

hurricanes play havoc with power lines. Much like bridges, transmission lines can fail in natural disasters, thereby isolating customers from their generation when that generation is not local.

- While every effort has been made to model San Francisco's projected energy requirements, there remains a number of potential projects that may notably increase the City's energy needs over and above that currently forecast. An example is the proposed cruise ship terminal where the ships would be required to interconnect with the Control Grid to operate while in port instead of relying on their 10 MW diesel generators that would pollute the area. Each 10 MW ship would consume the margin that was allowed in the Action Plan for one year's load growth. Activities such as this will require more generation to operate, and hasten the need for more projects to serve this volume of load.

- There are load-dropping schemes in place to assure compliance with the Reliability Criteria for critical double contingencies. Reducing San Francisco generation, as outlined in the Action Plan, may result in the need to increase the amount of load that is shed in the San Francisco Peninsula Area to mitigate line overloads for these critical double contingencies.

The ISO supports the interests of both the City and the community to allow for the existing generation to be released once the elements of the Action Plan are in place, but we caution the City that there are associated risks in operating a system at the minimum reliability required. The ISO remains supportive of the new City peaking power plant project and encourages the City to move forward expeditiously with the siting. You will therefore see that the City peaking power plant project is an integral part of the Action Plan and the continued reliability of the San Francisco power supply. We strongly encourage the City to foster new generation and transmission opportunities to further enhance both their ability to meet projected customer demand as well as provide critical operational flexibility in emergencies.

CALIFORNIA ISO

California Independent
System Operator

To: ISO Board of Governors

From: Marcie Edwards, Interim CEO

CC: ISO Officers; Board Assistant

Date: November 5, 2004

Re: ***Board Endorsement of Revised Action Plan for San Francisco***

This memorandum requires Board action.

EXECUTIVE SUMMARY

The purpose of this memo is to seek Board endorsement of the Revised Action Plan for San Francisco ("Revised Action Plan") to release existing generation located within the City of San Francisco from Reliability Must Run ("RMR") Agreements with the ISO.

Management recommends that the Board adopt the following motion:

MOVED,

> ***That the ISO Governing Board approves the Revised Action Plan attached to the memorandum dated November 5, 2004. Furthermore, the ISO Governing Board directs Management to forward said Revised Action Plan to the parties ultimately responsible for implementing the projects identified in the Revised Action plan, indicating that the ISO Governing Board fully endorses the Revised Action Plan.***

BACKGROUND

Original Action Plan – The reliability of the San Francisco power supply relies on old power plants that are coming to the end of their useful life. Over the course of several years the City and County of San Francisco ("City"), Pacific Gas & Electric ("PG&E") and the ISO have worked closely to identify new transmission and generation projects that can be used both to replace the existing generation and maintain the reliability of the San Francisco power supply. On September 10, 2004 you were provided an Action Plan that listed a combination of 14 transmission projects and 4 peaking power plants that allow the sequential shutdown of the existing generation.

On September 14, 2004 the ISO received a letter from the City seeking clarification of the need for the retrofit of Potrero power plant and inquiring about the feasibility of changing the sequence of the shutdown of the Potrero power plants. The City also spoke to the same matters during the September 15, 2004 Board meeting.

Revised Action Plan – On October 27, 2004 the ISO informed the City that Potrero 3 could be released from its RMR contract before Potrero 4, 5, and 6. This Revised Action Plan remains conditioned on the completion of the 14 PG&E transmission projects and the 4 City peaking power plants, as well as continued compliance with national and state reliability criteria. **Attachment 1** sets forth the list of transmission and generation projects that comprise the Revised Action Plan. Other than switching the order in which Potrero units are planned to be released from RMR, (and that

adjustment was made at the request of the City of San Francisco) the action plan otherwise remains unchanged
the one that was provided to the Board at the September 15, 2006 Board meeting. **Attachment 2** contains a lett
responding to questions raised by the City of San Francisco and information regarding forecasted capability of th
electric infrastructure, as well as zones of risk associated with maintaining electric system reliability.

Members of the community as well as representatives from Citizens for a Better Environment (CBE) seek the Boa
endorsement of the Revised Action Plan as assurance that the ISO will make a good faith commitment to the plar
Management considers this an important gesture of the ISO 's intent and is therefore supportive of that commitme

Management also takes this opportunity to commend the City and PG&E for the steps each have taken to identify
advance these and future infrastructure projects and looks forward to their continued efforts in these areas.

MANAGEMENT RECOMMENDATION

Management recommends that the Board approve the Revised Action Plan and direct Management to forward su
approved action plan to the parties responsible for developing the projects identified in the plan. Management co
to regularly update the Board on the parties' progress in implementing the Revised Action Plan.

MOVED,

> ***That the ISO Governing Board approves the Revised Action Plan attached to the memorandum dated November 5, 2004. Furthermore, the ISO Governing Board directs Management to forward said Revised Action Plan to the parties ultimately responsible for implementing the projects identified in the Revised Action Plan, indicating that the ISO Governing Board fully endorses the Revised Action Plan.***

Revised Action Plan

Attachment 1

PG&E Transmission Projects and City Peaking Power Plants Necessary
To Meet NERC/WECC/CAISO Planning Requirements

	Project	Estimated Completion Date/Status	Issue	Resolution of Issue
Release Hunters Point Units 2 & 3 From Their RMR Agreements				
1	Potrero Static VAR Compensator	December 2004, Under Construction	NERC/WECC/CAISO Planning Standards	This project allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 2 and 3 released from their RMR Agreement
Release Hunters Point Units 1 & 4 From Their RMR Agreements				
2	San Mateo-Martin No. 4 Line Voltage Conversion	Completed	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
3	Ravenswood 2nd 230/115 kV Transformer Project	Completed	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
4	San Francisco Internal Cable Higher Emergency Ratings	Completed: To Be Used Upon Completion of the Jefferson-Martin 230kV Project	NERC/WECC/CAISO Planning Standards	These ratings are an interim solution that in combination with the other listed projects allows PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreements. In 2007, a third Martin-Hunters Point 115 kV cable will replace the emergency ratings.
5	Tesla-Newark No. 2 230 kV Line Reconductoring	May 2005, Construction in Progress	RMR Criteria	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
6	Ravenswood-Ames 115 kV Lines Reinforcement	May 2005, Engineering in Progress	RMR Criteria	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
7	San Mateo 230 kV Bus Insulator Replacement	May 2005, Engineering in Progress	Operations Requirement During San Mateo Bus Wash	Eliminate bus wash at San Mateo 230 kV bus will reduce the 400 MW generation operational requirement down to less than 200 MW

8	Potrero-Hunters Point (AP-1) 115 kV Cable	December 2005 Pending CPUC Permit Approval	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
9	Jefferson-Martin 230 kV Line	December 2005 to March 2006	NERC/WECC/CAISO Planning Standards	This project in combination with the other listed projects allows ISO/PG&E to meet planning requirements with Hunters Point Power Plant Units 1 and 4 released from their RMR Agreement
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15	Add voltage support at Ravenswood substation	Under Evaluation By PG&E, likely to be scheduled for 2007	NERC/WECC/CAISO Planning Standards	This upgrade is needed in combination with the other listed mitigations to allow ISO/PG&E to meet planning requirements with Potrero Units 4, 5, and 6 released from their RMR Agreement

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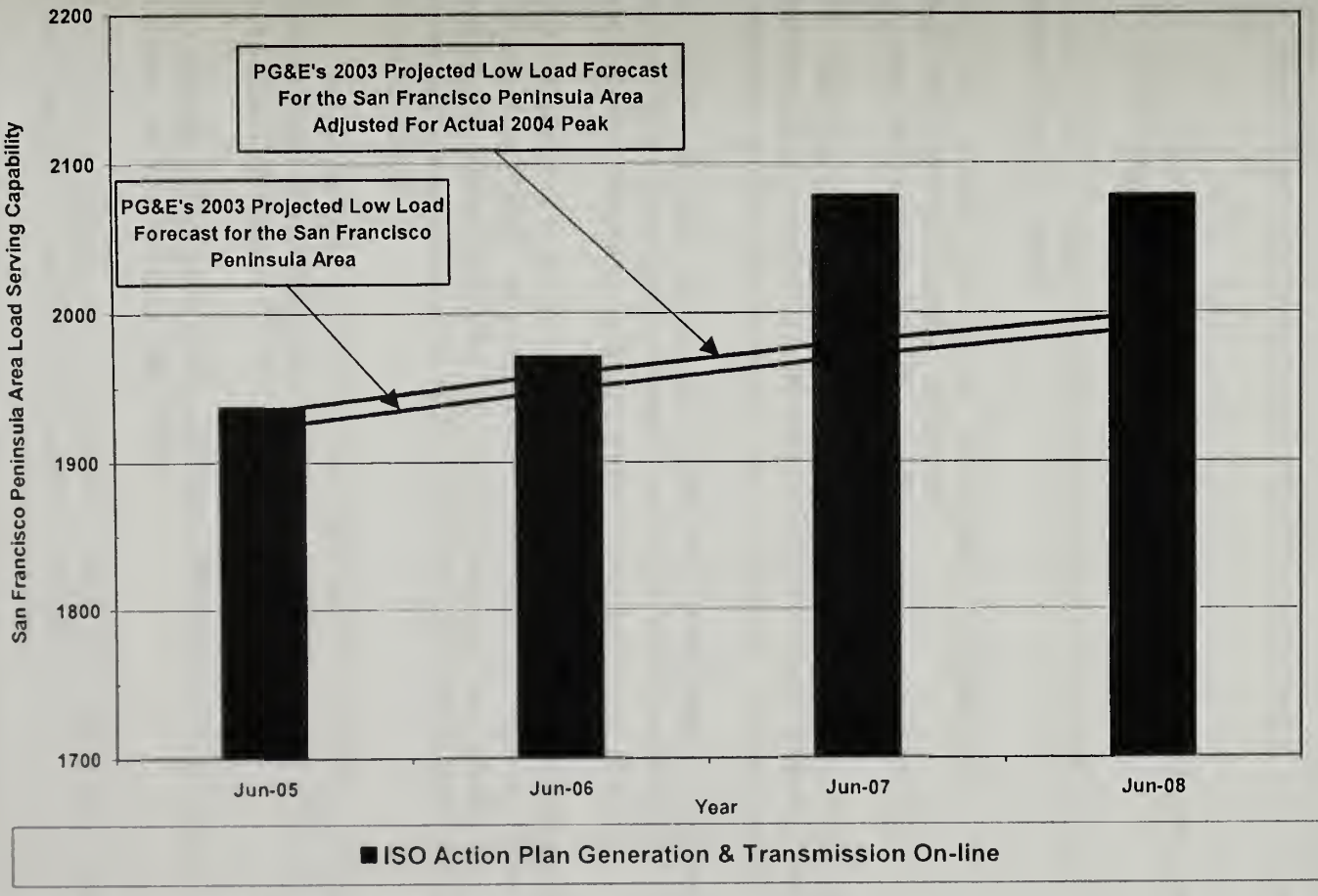
San Francisco Peninsula Area Load Serving Capability
Based On the Revised Action Plan



Note: The columns represent the aggregate capability to serve load in the San Francisco Peninsula Area
ISO Grid Planning 10/18/2004

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GENERAL CONDITIONS
INCLUDING
COMPLIANCE MONITORING AND CLOSURE PLAN

Marc S. Pryor

INTRODUCTION

The project General Conditions Including Compliance Monitoring and Closure Plan (Compliance Plan) have been established as required by Public Resources Code section 25532. The plan provides a means for assuring that the facility is constructed, operated and closed in compliance with public health and safety, environmental and other applicable regulations, guidelines, and conditions adopted or established by the California Energy Commission and specified in the written decision on the Application for Certification or otherwise required by law.

The Compliance Plan is composed of elements that:

- set forth the duties and responsibilities of the Compliance Project Manager, the project owner, delegate agencies, and others;
- set forth the requirements for handling confidential records and maintaining the compliance record;
- state procedures for settling disputes and making post-certification changes;
- state the requirements for periodic compliance reports and other administrative procedures that are necessary to verify the compliance status for all Energy Commission approved conditions of certification;
- establish requirements for facility closure plans.
- specify conditions of certification for each technical area containing the measures required to mitigate any and all potential adverse project impacts associated with construction, operation and closure to an insignificant level. Each specific condition of certification also includes a verification provision that describes the method of assuring that the condition has been satisfied.

DEFINITIONS

The following terms and definitions are used to establish when conditions of certification are implemented:

PRE-CONSTRUCTION SITE MOBILIZATION

Site mobilization is limited preconstruction activities at the site to allow for the installation of construction trailers, construction trailer utilities, and construction trailer parking at the site. Limited ground disturbance, grading, and trenching associated with the above mentioned pre-construction activities is considered part of site mobilization. Fencing for the site is also considered part of site mobilization. Walking, driving or parking a passenger vehicle, pickup truck and light vehicles is allowable during site mobilization.

CONSTRUCTION GROUND DISTURBANCE

Construction-related ground disturbance refers to activities that result in the removal of top soil or vegetation at the site and for access roads and linear facilities.

CONSTRUCTION GRADING, BORING, AND TRENCHING

Construction-related grading, boring, and trenching refers to activities that result in subsurface soil work at the site and for access roads and linear facilities, e.g, alteration of the topographical features such as leveling, removal of hills or high spots, moving of soil from one area to another, and removal of soil.

CONSTRUCTION

[From section 25105 of the Warren-Alquist Act.] Onsite work to install permanent equipment or structures for any facility. Construction does **not** include the following:

1. the installation of environmental monitoring equipment;
2. a soil or geological investigation;
3. a topographical survey;
4. any other study or investigation to determine the environmental acceptability or feasibility of the use of the site for any particular facility; or
5. any work to provide access to the site for any of the purposes specified in "Construction" 1, 2, 3, or 4 above.

START OF COMMERCIAL OPERATION

For compliance monitoring purposes, "commercial operation" begins after the completion of start-up and commissioning, where the power plant has reached reliable steady-state production of electricity at the rated capacity. For example, at the start of commercial operation, plant control is usually transferred from the construction manager to the plant operations manager.

COMPLIANCE PROJECT MANAGER RESPONSIBILITIES

The Compliance Project Manager (CPM) will oversee the compliance monitoring and shall be responsible for:

1. ensuring that the design, construction, operation, and closure of the project facilities are in compliance with the terms and conditions of the Energy Commission Decision;
2. resolving complaints;
3. processing post-certification changes to the conditions of certification, project description, and ownership or operational control;
4. documenting and tracking compliance filings; and
5. ensuring that the compliance files are maintained and accessible.

The CPM is the contact person for the Energy Commission and will consult with appropriate responsible agencies and the Energy Commission when handling disputes, complaints and amendments.

All project compliance submittals are submitted to the CPM for processing. Where a submittal required by a condition of certification requires CPM approval, the approval will involve all appropriate Energy Commission staff and management.

PRE-CONSTRUCTION AND PRE-OPERATION COMPLIANCE MEETING

The CPM usually schedules pre-construction and pre-operation compliance meetings prior to the projected start-dates of construction, plant operation, or both. The purpose of these meetings will be to assemble both the Energy Commission's and the project owner's technical staff to review the status of all pre-construction or pre-operation requirements contained in the Energy Commission's conditions of certification to confirm that they have been met, or if they have not been met, to ensure that the proper action is taken. In addition, these meetings ensure, to the extent possible, that Energy Commission conditions will not delay the construction and operation of the plant due to oversight, and to preclude any last minute, unforeseen issues from arising. Pre-construction meetings held during the certification process must be publicly noticed unless they are confined to administrative issues and processes.

ENERGY COMMISSION RECORD

The Energy Commission shall maintain as a public record, in either the Compliance file or Docket file, for the life of the project (or other period as required):

1. all documents demonstrating compliance with any legal requirements relating to the construction and operation of the facility;
2. all monthly and annual compliance reports filed by the project owner;
3. all complaints of noncompliance filed with the Energy Commission; and
4. all petitions for project or condition of certification changes and the resulting staff or Energy Commission action.

PROJECT OWNER RESPONSIBILITIES

The project owner is responsible for ensuring that the general compliance conditions and all of the other conditions of certification that appear in the staff assessment sections are satisfied. The general compliance conditions regarding post-certification changes specify measures that the project owner must take when requesting changes in the project design, conditions of certification, or ownership. Failure to comply with any of the conditions of certification or the general compliance conditions may result in reopening of the case and revocation of Energy Commission certification, an administrative fine, or other action as appropriate. A summary of the General Conditions of Certification is included as **Compliance Table 1** at the conclusion of this section. The designation after each of the following summaries of the General Compliance Conditions (**COMPLIANCE-1, COMPLIANCE-2,** etc.) refers to the specific General Compliance Condition contained in **Compliance Table 1.**

Construction Milestones, Compliance Condition of Certification 1 (COMPLIANCE-1)

The Monthly Compliance Report is the vehicle for notifying the CPM of applicable construction milestones, or for amending previously established milestones, for pre-construction and construction phases of the project. The project owner may also send a letter, an e-mail message, or make a phone call to notify the CPM of planned changes to the milestones.

A. ESTABLISH PRE-CONSTRUCTION MILESTONES TO ENABLE START OF CONSTRUCTION (WITHIN ONE YEAR OF CERTIFICATION WHEN REQUIRED)

1. Obtain site control
2. Obtain financing

B. ESTABLISH CONSTRUCTION MILESTONES FROM DATE OF START OF CONSTRUCTION

1. Begin pouring major foundation concrete
2. Begin installation of major equipment
3. Complete installation of major equipment
4. Begin gas pipeline construction
5. Complete gas pipeline interconnection
6. Begin T-line construction
7. Complete T-line interconnection

The CPM will negotiate the above-cited pre-construction and construction milestones with the project owner based on an expected schedule of construction. The CPM may agree to modify the final milestones from those listed above at any time prior to or during construction if the project owner demonstrates good cause for not meeting the originally-established milestones.

A. FINDING THAT THERE IS GOOD CAUSE FOR FAILURE TO MEET MILESTONES WILL BE MADE IF ANY OF THE FOLLOWING CRITERIA ARE MET:

1. The change in any milestone does not change the established commercial operation date milestone.
2. The milestone will be missed due to circumstances beyond the project owner's control.
3. The milestone will be missed, but the project owner demonstrates a good-faith effort to meet the project milestone.
4. The milestone will be missed due to unforeseen natural disasters or acts of God that prevent timely completion of the milestones.
5. The milestone will be missed due to requirements of the California ISO.

Unrestricted Access (COMPLIANCE-2)

The CPM, responsible Energy Commission staff, and delegate agencies or consultants shall be guaranteed and granted unrestricted access to the power plant site, related facilities, project-related staff, and the records maintained on site, for the purpose of conducting audits, surveys, inspections, or general site visits. Although the CPM will normally schedule site visits on dates and times agreeable to the project owner, the CPM reserves the right to make unannounced visits at any time.

Compliance Record (COMPLIANCE-3)

The project owner shall maintain project files onsite or at an alternative site approved by the CPM, for the life of the project unless a lesser period of time is specified by the conditions of certification. The files shall contain copies of all "as-built" drawings, all documents submitted as verification for conditions, and all other project-related documents.

Energy Commission staff and delegate agencies shall, upon request to the project owner, be given unrestricted access to the files.

Compliance Verification Submittals (COMPLIANCE-4)

Each condition of certification is followed by a means of verification. The verification describes the Energy Commission's procedure(s) to ensure post-certification compliance with adopted conditions. The verification procedures, unlike the conditions, may be modified as necessary by the CPM, and in most cases without full Energy Commission approval.

Verification of compliance with the conditions of certification can be accomplished by:

1. reporting on the work done and providing the pertinent documentation in monthly and/or annual compliance reports filed by the project owner or authorized agent as required by the specific conditions of certification;
2. providing appropriate letters from delegate agencies verifying compliance;
3. Energy Commission staff audits of project records; and/or
4. Energy Commission staff inspections of mitigation or other evidence of mitigation.

Verificaion lead times (e.g., 90, 60 and 30-days) associated with start of construction may require the project owner to file submittals during the certification process, particularly if construction is planned to commence shortly after certification.
A cover letter from the project owner or authorized agent is required for all compliance submittals and correspondence pertaining to compliance matters. **The cover letter subject line shall identify the involved condition(s) of certification by condition number and include a brief description of the subject of the submittal**. The project owner shall also identify those submittals **not** required by a condition of certification with a statement such as: "This submittal is for information only and is not required by a specific condition of certification." When submitting supplementary or corrected information, the project owner shall reference the date of the previous submittal.

The project owner is responsible for the delivery and content of all verification submittals to the CPM, whether such condition was satisfied by work performed by the project owner or an agent of the project owner.

All submittals shall be addressed as follows:

Compliance Project Manager
California Energy Commission
1516 Ninth Street (MS-2000)
Sacramento, CA 95814

If the project owner desires Energy Commission staff action by a specific date, they shall so state in their submittal cover letter and include a detailed explanation of the effects on the project if this date is not met.

Pre-Construction Matrix and Tasks Prior to Start of Construction (COMPLIANCE-5)

Prior to commencing construction, a compliance matrix addressing only those conditions that must be fulfilled before the start of construction shall be submitted by the project owner to the CPM. This matrix will be included with the project owner's **first** compliance submittal or prior to the first pre-construction meeting, whichever comes first. It will be in the same format as the compliance matrix referenced above.

Construction shall not commence until the pre-construction matrix is submitted, all pre-construction conditions have been complied with, and the CPM has issued a letter to the project owner authorizing construction. Various lead times (e.g., 30, 60, 90 days) for submittal of compliance verification documents to the CPM for conditions of certification are established to allow sufficient staff time to review and comment and, if necessary, allow the project owner to revise the submittal in a timely manner. This will ensure that project construction may proceed according to schedule.

Failure to submit compliance documents within the specified lead-time may result in delays in authorization to commence various stages of project development.

If the project owner anticipates starting project construction as soon as the project is certified, it may be necessary for the project owner to file compliance submittals prior to project certification. This is important if the required lead-time for a required compliance event extends beyond the date anticipated for start of construction. It is also important that the project owner understand that the submittal of compliance documents prior to project certification is at the owner's own risk. Any approval by Energy Commission staff is subject to change based upon the Final Decision.

COMPLIANCE REPORTING

There are two different compliance reports that the project owner must submit to assist the CPM in tracking activities and monitoring compliance with the terms and conditions of the Energy Commission Decision. During construction, the project owner or authorized agent will submit Monthly Compliance Reports. During operation, an Annual Compliance Report must be submitted. These reports, and the requirement for an accompanying compliance matrix, are described below. The majority of the conditions

of certification require that compliance submittals be submitted to the CPM in the monthly or annual compliance reports.

Compliance Matrix (COMPLIANCE-6)

A compliance matrix shall be submitted by the project owner to the CPM along with each monthly and annual compliance report. The compliance matrix is intended to provide the CPM with the current status of all compliance conditions in a spreadsheet format. The compliance matrix must identify:

1. the technical area;
2. the condition number;
3. a brief description of the verification action or submittal required by the condition;
4. the date the submittal is required (e.g., 60 days prior to construction, after final inspection, etc.);
5. the expected or actual submittal date;
6. the date a submittal or action was approved by the Chief Building Official (CBO), CPM, or delegate agency, if applicable; and
7. the compliance status of each condition, e.g., "not started," "in progress" or "completed" (include the date).

Satisfied conditions do not need to be included in the compliance matrix after they have been identified as satisfied in at least one monthly or annual compliance report.

Monthly Compliance Report (COMPLIANCE-7)

The first Monthly Compliance Report is due one month following the Energy Commission business meeting date upon which the project was approved, unless otherwise agreed to by the CPM. The first Monthly Compliance Report shall include an initial list of dates for each of the events identified on the **Key Events List. The Key Events List Form is found at the end of this section.**

During pre-construction and construction of the project, the project owner or authorized agent shall submit an original and five copies of the Monthly Compliance Report within 10 working days after the end of each reporting month. Monthly Compliance Reports shall be clearly identified for the month being reported. The reports shall contain, at a minimum:

1. a summary of the current project construction status, a revised/updated schedule if there are significant delays, and an explanation of any significant changes to the schedule;
2. documents required by specific conditions to be submitted along with the Monthly Compliance Report. Each of these items must be identified in the transmittal letter, and should be submitted as attachments to the Monthly Compliance Report;
3. an initial, and thereafter updated, compliance matrix showing the status of all conditions of certification and pre-construction and construction milestones (fully

satisfied conditions do not need to be included in the matrix after they have been reported as closed);

4. a list of conditions and milestones that have been satisfied during the reporting period, and a description or reference to the actions that satisfied the condition;
5. a list of any submittal deadlines that were missed, accompanied by an explanation and an estimate of when the information will be provided;
6. a cumulative listing of any approved changes to conditions of certification;
7. a listing of any filings submitted to, or permits issued by, other governmental agencies during the month;
8. a projection of project compliance activities scheduled during the next two months. The project owner shall notify the CPM as soon as any changes are made to the project construction schedule that would affect compliance with conditions of certification or milestones;
9. a listing of the month's additions to the on-site compliance file;
10. any requests to dispose of items that are required to be maintained in the project owner's compliance file; and
11. a listing of complaints, notices of violation, official warnings, and citations received during the month, a description of the resolution of the resolved complaints, and the status of any unresolved complaints.

Annual Compliance Report (COMPLIANCE-8)

After construction is complete, the project owner shall submit Annual Compliance Reports instead of Monthly Compliance Reports. The reports are for each year of commercial operation and are due to the CPM each year at a date agreed to by the CPM. Annual Compliance Reports shall be submitted over the life of the project unless otherwise specified by the CPM. Each Annual Compliance Report shall identify the reporting period and shall contain the following:

1. an updated compliance matrix showing the status of all conditions of certification (fully satisfied and/or closed conditions do not need to be included in the matrix after they have been reported as closed);
2. a summary of the current project operating status and an explanation of any significant changes to facility operations during the year;
3. documents required by specific conditions to be submitted along with the Annual Compliance Report. Each of these items must be identified in the transmittal letter, and should be submitted as attachments to the Annual Compliance Report;
4. a cumulative listing of all post-certification changes approved by the Energy Commission or cleared by the CPM;
5. an explanation for any submittal deadlines that were missed, accompanied by an estimate of when the information will be provided;
6. a listing of filings submitted to, or permits issued by, other governmental agencies during the year;
7. a projection of project compliance activities scheduled during the next year;

8. a listing of the year's additions to the on-site compliance file;
9. an evaluation of the on-site contingency plan for unplanned facility closure, including any suggestions necessary for bringing the plan up to date [see General Conditions for Facility Closure addressed later in this section]; and
10. a listing of complaints, notices of violation, official warnings, and citations received during the year, a description of the resolution of any resolved complaints, and the status of any unresolved complaints.

Confidential Information (COMPLIANCE-9)

Any information that the project owner deems confidential shall be submitted to the Energy Commission's Docket with an application for confidentiality pursuant to Title 20, California Code of Regulations, section 2505(a). Any information that is determined to be confidential shall be kept confidential as provided for in Title 20, California Code of Regulations, section 2501 et. seq.

Annual Energy Facility Compliance Fee (COMPLIANCE-10)

Pursuant to the provisions of Section 25806(b) of the Public Resources Code, the project owner is required to pay an annual fee which may be adjusted annually. The initial payment is due on the date the Energy Commission adopts the final decision. All subsequent payments are due by July 1 of each year in which the facility retains its certification. The payment instrument shall be made payable to the California Energy Commission and mailed to: Accounting Office MS-02, California Energy Commission, 1516 9th St., Sacramento, CA 95814.

Reporting of Complaints, Notices, and Citations (COMPLIANCE-11)

Prior to the start of construction, the project owner must send a letter to property owners living within one mile of the project notifying them of a telephone number to contact project representatives with questions, complaints or concerns. If the telephone is not staffed 24 hours per day, it shall include automatic answering with date and time stamp recording. All recorded complaints shall be responded to within 24 hours. The telephone number shall be posted at the project site and made easily visible to passersby during construction and operation. The telephone number shall be provided to the CPM who will post it on the Energy Commission's web page at:

http://www.energy.ca.gov/sitingcases/power_plants_contacts.html

Any changes to the telephone number shall be submitted immediately to the CPM, who will update the web page.

In addition to the monthly and annual compliance reporting requirements described above, the project owner shall report and provide copies to the CPM of all complaint forms, notices of violation, notices of fines, official warnings, and citations, within 10 days of receipt,. Complaints shall be logged and numbered. Noise complaints shall be recorded on the form provided in the **NOISE** conditions of certification. All other complaints shall be recorded on the complaint form (Attachment A).

FACILITY CLOSURE

At some point in the future, the project will cease operation and close down. At that time, it will be necessary to ensure that the closure occurs in such a way that public health and safety and the environment are protected from adverse impacts. Although the project setting for this project does not appear, at this time, to present any special or unusual closure problems, it is impossible to foresee what the situation will be in 30 years or more when the project ceases operation. Therefore, provisions must be made that provide the flexibility to deal with the specific situation and project setting that exist at the time of closure. Laws, Ordinances, Regulations and Standards (LORS) pertaining to facility closure are identified in the sections dealing with each technical area. Facility closure will be consistent with LORS in effect at the time of closure.
There are at least three circumstances in which a facility closure can take place: planned closure, unplanned temporary closure and unplanned permanent closure.

CLOSURE DEFINITIONS

Planned Closure

A planned closure occurs at the end of a project's life, when the facility is closed in an anticipated, orderly manner, at the end of its useful economic or mechanical life, or due to gradual obsolescence.

Unplanned Temporary Closure

An unplanned temporary closure occurs when the facility is closed suddenly and/or unexpectedly, on a short-term basis, due to unforeseen circumstances such as a natural disaster or an emergency.

Unplanned Permanent Closure

An unplanned permanent closure occurs if the project owner closes the facility suddenly and/or unexpectedly, on a permanent basis. This includes unplanned closure where the owner remains accountable for implementing the on-site contingency plan. It can also include unplanned closure where the project owner is unable to implement the contingency plan, and the project is essentially abandoned.

GENERAL CONDITIONS FOR FACILITY CLOSURE

Planned Closure (COMPLIANCE-12)

In order to ensure that a planned facility closure does not create adverse impacts, a closure process that provides for careful consideration of available options and applicable laws, ordinances, regulations, standards, and local/regional plans in existence at the time of closure, will be undertaken. To ensure adequate review of a planned project closure, the project owner shall submit a proposed facility closure plan to the Energy Commission for review and approval at least 12 months prior to commencement of closure activities (or other period of time agreed to by the CPM). The project owner shall file 120 copies (or other number of copies agreed upon by the CPM) of a proposed facility closure plan with the Energy Commission.

The plan shall:

1. identify and discuss any impacts and mitigation to address significant adverse impacts associated with proposed closure activities and to address facilities, equipment, or other project related remnants that will remain at the site;
2. identify a schedule of activities for closure of the power plant site, transmission line corridor, and all other appurtenant facilities constructed as part of the project;
3. identify any facilities or equipment intended to remain on site after closure, the reason, and any future use; and
4. address conformance of the plan with all applicable laws, ordinances, regulations, standards, and local/regional plans in existence at the time of facility closure, and applicable conditions of certification.

Prior to submittal of the proposed facility closure plan, a meeting shall be held between the project owner and the Energy Commission CPM for the purpose of discussing the specific contents of the plan.

In the event that there are significant issues associated with the proposed facility closure plan's approval, or the desires of local officials or interested parties are inconsistent with the plan, the CPM shall hold one or more workshops and/or the Energy Commission may hold public hearings as part of its approval procedure.

As necessary, prior to or during the closure plan process, the project owner shall take appropriate steps to eliminate any immediate threats to public health and safety and the environment, but shall not commence any other closure activities until Energy Commission approval of the facility closure plan is obtained.

Unplanned Temporary Closure/On-Site Contingency Plan (COMPLIANCE-13)

In order to ensure that public health and safety and the environment are protected in the event of an unplanned temporary facility closure, it is essential to have an on-site contingency plan in place. The on-site contingency plan will help to ensure that all necessary steps to mitigate public health and safety impacts and environmental impacts are taken in a timely manner.

The project owner shall submit an on-site contingency plan for CPM review and approval. The plan shall be submitted no less that 60 days (or other time agreed to by the CPM) prior to commencement of commercial operation. The approved plan must be in place prior to commercial operation of the facility and shall be kept at the site at all times.

The project owner, in consultation with the CPM, will update the on-site contingency plan as necessary. The CPM may require revisions to the on-site contingency plan over the life of the project. In the annual compliance reports submitted to the Energy Commission, the project owner will review the on-site contingency plan, and recommend changes to bring the plan up to date. Any changes to the plan must be approved by the CPM.

The on-site contingency plan shall provide for taking immediate steps to secure the facility from trespassing or encroachment. In addition, for closures of more than 90 days, unless other arrangements are agreed to by the CPM, the plan shall provide for removal of hazardous materials and hazardous wastes, draining of all chemicals from storage tanks and other equipment, and the safe shutdown of all equipment. (Also see specific conditions of certification for the technical areas of **Hazardous Materials Management** and **Waste Management**.).

In addition, consistent with requirements under unplanned permanent closure addressed below, the nature and extent of insurance coverage, and major equipment warranties must also be included in the on-site contingency plan. In addition, the status of the insurance coverage and major equipment warranties must be updated in the annual compliance reports.

In the event of an unplanned temporary closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the circumstances and expected duration of the closure.

If the CPM determines that an unplanned temporary closure is likely to be permanent, or for a duration of more than 12 months, a closure plan consistent with the requirements for a planned closure shall be developed and submitted to the CPM within 90 days of the CPM's determination (or other period of time agreed to by the CPM).

Unplanned Permanent Closure/On-Site Contingency Plan (COMPLIANCE-14)

The on-site contingency plan required for unplanned temporary closure shall also cover unplanned permanent facility closure. All of the requirements specified for unplanned temporary closure shall also apply to unplanned permanent closure.

In addition, the on-site contingency plan shall address how the project owner will ensure that all required closure steps will be successfully undertaken in the unlikely event of abandonment.

In the event of an unplanned permanent closure, the project owner shall notify the CPM, as well as other responsible agencies, by telephone, fax, or e-mail, within 24 hours and shall take all necessary steps to implement the on-site contingency plan. The project owner shall keep the CPM informed of the status of all closure activities.

A closure plan, consistent with the requirements for a planned closure, shall be developed and submitted to the CPM within 90 days of the permanent closure or another period of time agreed to by the CPM.

CBO DELEGATION AND AGENCY COOPERATION

In performing construction and operation monitoring of the project, Energy Commission staff acts as, and has the authority of, the Chief Building Official (CBO). Energy

Commission staff may delegate CBO responsibility to either an independent third party contractor or the local building official. Energy Commission staff retains CBO authority when selecting a delegate CBO, including enforcing and interpreting state and local codes, and use of discretion, as necessary, in implementing the various codes and standards.

Energy Commission staff may also seek the cooperation of state, regional and local agencies that have an interest in environmental protection when conducting project monitoring.

ENFORCEMENT

The Energy Commission's legal authority to enforce the terms and conditions of its Decision is specified in Public Resources Code sections 25534 and 25900. The Energy Commission may amend or revoke the certification for any facility, and may impose a civil penalty for any significant failure to comply with the terms or conditions of the Energy Commission Decision. The specific action and amount of any fines the Energy Commission may impose would take into account the specific circumstances of the incident(s). This would include such factors as the previous compliance history, whether the cause of the incident involves willful disregard of LORS, oversight, unforeseeable events, and other factors the Energy Commission may consider.

Moreover, to ensure compliance with the terms and conditions of certification and applicable LORS, delegate agencies are authorized to take any action allowed by law in accordance with their statutory authority, regulations, and administrative procedures.

NONCOMPLIANCE COMPLAINT PROCEDURES

Any person or agency may file a complaint alleging noncompliance with the conditions of certification. Such a complaint will be subject to review by the Energy Commission pursuant to Title 20, California Code of Regulations, section 1230 et seq., but in many instances the noncompliance can be resolved by using the informal dispute resolution process. Both the informal and formal complaint procedure, as described in current State law and regulations, are described below. They shall be followed unless superseded by current law or regulations.

The Energy Commission has established a toll free compliance telephone number of **1-800-858-0784** for the public to contact the Energy Commission about power plant construction or operation-related questions, complaints or concerns.

Informal Dispute Resolution Procedure

The following procedure is designed to informally resolve disputes concerning the interpretation of compliance with the requirements of this compliance plan. The project owner, the Energy Commission, or any other party, including members of the public, may initiate this procedure for resolving a dispute. Disputes may pertain to actions or decisions made by any party, including the Energy Commission's delegate agents. This procedure may precede the more formal complaint and investigation procedure specified in Title 20, California Code of Regulations, section 1230 et seq., but is not intended to be a substitute for, or prerequisite to it. This informal procedure may not be

used to change the terms and conditions of certification as approved by the Energy Commission, although the agreed upon resolution may result in a project owner, or in some cases the Energy Commission staff, proposing an amendment.

The procedure encourages all parties involved in a dispute to discuss the matter and to reach an agreement resolving the dispute. If a dispute cannot be resolved, then the matter must be referred to the full Energy Commission for consideration via the complaint and investigation process. The procedure for informal dispute resolution is as follows:

Request for Informal Investigation

Any individual, group, or agency may request the Energy Commission to conduct an informal investigation of alleged noncompliance with the Energy Commission's terms and conditions of certification. All requests for informal investigations shall be made to the designated CPM.

Upon receipt of a request for informal investigation, the CPM shall promptly notify the project owner of the allegation by telephone and letter. All known and relevant information of the alleged noncompliance shall be provided to the project owner and to the Energy Commission staff. The CPM will evaluate the request and the information to determine if further investigation is necessary. If the CPM finds that further investigation is necessary, the project owner will be asked to promptly investigate the matter and within seven working days of the CPM's request, provide a written report to the CPM of the results of the investigation, including corrective measures proposed or undertaken. Depending on the urgency of the noncompliance matter, the CPM may conduct a site visit and/or request the project owner to provide an initial report, within 48 hours, followed by a written report filed within seven days.

Request for Informal Meeting

In the event that either the party requesting an investigation or the Energy Commission staff is not satisfied with the project owner's report, investigation of the event, or corrective measures proposed or undertaken, either party may submit a written request to the CPM for a meeting with the project owner. Such request shall be made within 14 days of the project owner's filing of its written report. Upon receipt of such a request, the CPM shall:

1. immediately schedule a meeting with the requesting party and the project owner, to be held at a mutually convenient time and place;
2. secure the attendance of appropriate Energy Commission staff and staff of any other agencies with expertise in the subject area of concern, as necessary;
3. conduct such meeting in an informal and objective manner so as to encourage the voluntary settlement of the dispute in a fair and equitable manner; and
4. after the conclusion of such a meeting, promptly prepare and distribute copies to all in attendance and to the project file, a summary memorandum that fairly and accurately identifies the positions of all parties and any conclusions reached. If an agreement has not been reached, the CPM shall inform the complainant of the

formal complaint process and requirements provided under Title 20, California Code of Regulations, section 1230 et seq.

Formal Dispute Resolution Procedure-Complaints and Investigations

If either the project owner, Energy Commission staff, or the party requesting an investigation is not satisfied with the results of the informal dispute resolution process, such party may file a complaint or a request for an investigation with the Energy Commission's General Counsel. Disputes may pertain to actions or decisions made by any party including the Energy Commission's delegate agents. Requirements for complaint filings and a description of how complaints are processed are in Title 20, California Code of Regulations, section 1230 et seq.

The Energy Commission Chair, upon receipt of a written request stating the basis of the dispute, may grant a hearing on the matter, consistent with the requirements of noticing provisions. The Energy Commission shall have the authority to consider all relevant facts involved and make any appropriate orders consistent with its jurisdiction (Cal. Code Regs., tit. 20, §§ 1232-1236).

POST CERTIFICATION CHANGES TO THE ENERGY COMMISSION DECISION: AMENDMENTS, OWNERSHIP CHANGES, INSIGNIFICANT PROJECT CHANGES AND VERIFICATION CHANGES (COMPLIANCE-15)

The project owner must petition the Energy Commission pursuant to Title 20, California Code of Regulations, section 1769, in order to modify the project (including linear facilities) design, operation or performance requirements, and to transfer ownership or operational control of the facility. **It is the responsibility of the project owner to contact the CPM to determine if a proposed project change should be considered a project modification pursuant to section 1769.** Implementation of a project modification without first securing Energy Commission or Energy Commission staff approval may result in enforcement action that could result in civil penalties in accordance with section 25534 of the Public Resources Code.

A petition is required for **amendments** and for **insignificant project changes** as specified below. For verification changes, a letter from the project owner is sufficient. In all cases, the petition or letter requesting a change should be submitted to the CPM, who will file it with the Energy Commission's Docket in accordance with Title 20, California Code of Regulations, section 1209.

The criteria that determine which type of approval and the process that applies are explained below.

AMENDMENT

The project owner shall petition the Energy Commission, pursuant to Title 20, California Code of Regulations, Section 1769, when proposing modifications to the project (including linear facilities) design, operation, or performance requirements. If a proposed

modification results in deletion or change of a condition of certification, or makes changes that would cause the project not to comply with any applicable laws, ordinances, regulations or standards, the petition will be processed as a formal amendment to the final decision, which requires public notice and review of the Energy Commission staff analysis, and approval by the full Commission. This process takes approximately two to three months to complete, and possibly longer for complex project modifications.

CHANGE OF OWNERSHIP

Change of ownership or operational control also requires that the project owner file a petition pursuant to section 1769 (b). This process takes approximately one month to complete, and requires public notice and approval by the full Commission.

INSIGNIFICANT PROJECT CHANGE

Modifications that do not result in deletions or changes to conditions of certification, and that are compliant with laws, ordinances, regulations and standards may be authorized by the CPM as an insignificant project change pursuant to section 1769(a) (2). This process usually takes less than one month to complete, and it requires a 14-day public review of the Notice of Insignificant Project Change that includes staff's intention to approve the modification unless substantive objections are filed.

VERIFICATION CHANGE

A verification may be modified by the CPM without requesting an amendment to the decision if the change does not conflict with the conditions of certification and provides an effective alternate means of verification. This process usually takes less than five working days to complete.

KEY EVENTS LIST

PROJECT: _____

DOCKET #: _____

COMPLIANCE PROJECT MANAGER: _____

EVENT DESCRIPTION	DATE
ertification Date/Obtain Site Control	
nline Date	
POWER PLANT SITE ACTIVITIES	
art Site Mobilization	
art Ground Disturbance	
art Grading	
art Construction	
egin Pouring Major Foundation Concrete	
egin Installation of Major Equipment	
ompletion of Installation of Major Equipment	
rst Combustion of Gas Turbine	
art Commercial Operation	
omplete All Construction	
TRANSMISSION LINE ACTIVITIES	
tart T/L Construction	
ynchronization with Grid and Interconnection	
omplete T/L Construction	
FUEL SUPPLY LINE ACTIVITIES	
tart Gas Pipeline Construction and Interconnection	
omplete Gas Pipeline Construction	
WATER SUPPLY LINE ACTIVITIES	
tart Water Supply Line Construction	
omplete Water Supply Line Construction	

GENERAL CONDITIONS TABLE 1
COMPLIANCE SECTION
SUMMARY of GENERAL CONDITIONS OF CERTIFICATION

CONDITION NUMBER	SUBJECT	DESCRIPTION
COMPLIANCE-1	Construction Milestones	The project owner shall establish specific performance milestones for pre-construction and construction phases of the project.
COMPLIANCE-2	Access	The project owner shall grant Energy Commission staff and delegate agencies or consultants unrestricted access to the power plant site.
COMPLIANCE-3	Compliance Record	The project owner shall maintain project files on-site. Energy Commission staff and delegate agencies shall be given unrestricted access to the files.
COMPLIANCE-4	Compliance Verification Submittals	The project owner is responsible for the delivery and content of all verification submittals to the CPM, whether such condition was satisfied by work performed or the project owner or his agent.
COMPLIANCE-5	Pre-construction Matrix and Tasks Prior to Start of Construction	Construction shall not commence until the all of the following activities/submittals have been completed: ▪ property owners living within one mile of the project have been notified of a telephone number to contact for questions, complaints or concerns, ▪ a pre-construction matrix has been submitted identifying only those conditions that must be fulfilled before the start of construction, ▪ all pre-construction conditions have been complied with, ▪ the CPM has issued a letter to the project owner authorizing construction.
COMPLIANCE-6	Compliance Matrix	The project owner shall submit a compliance matrix (in a spreadsheet format) with each monthly and annual compliance report which includes the status of all compliance conditions of certification.
COMPLIANCE-7	Monthly Compliance Report including a Key Events List	During construction, the project owner shall submit Monthly Compliance Reports (MCRs) which include specific information. The first MCR is due the month following the Energy Commission business meeting date on which the project was approved and shall include an initial list of dates for each of the events identified on the Key Events List.

CONDITION NUMBER	SUBJECT	DESCRIPTION
COMPLIANCE-8	Annual Compliance Reports	After construction ends and throughout the life of the project, the project owner shall submit Annual Compliance Reports instead of Monthly Compliance Reports.
COMPLIANCE-9	Confidential Information	Any information the project owner deems confidential shall be submitted to the Energy Commission's Dockets Unit.
COMPLIANCE-10	Annual fees	Payment of Annual Energy Facility Compliance Fee.
COMPLIANCE-11	Reporting of Complaints, Notices and Citations	Within 10 days of receipt, the project owner shall report to the CPM, all notices, complaints, and citations.
COMPLIANCE-12	Planned Facility Closure	The project owner shall submit a closure plan to the CPM at least 12 months prior to commencement of a planned closure.
COMPLIANCE-13	Unplanned Temporary Facility Closure	To ensure that public health and safety and the environment are protected in the event of an unplanned temporary closure, the project owner shall submit an on-site contingency plan no less than 60 days prior to commencement of commercial operation.
COMPLIANCE-14	Unplanned Permanent Facility Closure	To ensure that public health and safety and the environment are protected in the event of an unplanned permanent closure, the project owner shall submit an on-site contingency plan no less than 60 days prior to commencement of commercial operation.
COMPLIANCE-15	Post-certification changes to the Decision	The project owner must petition the Energy Commission to delete or change a condition of certification, modify the project design or operational requirements and/or transfer ownership of operational control of the facility.

ATTACHMENT A

COMPLAINT REPORT/RESOLUTION FORM

PROJECT NAME:
AFC Number:

COMPLAINT LOG NUMBER _____
Complainant's name and address:

Phone number: _____

Date and time complaint received:

Indicate if by telephone or in writing (attach copy if written):
Date of first occurrence:

Description of complaint (including dates, frequency, and duration):

Findings of investigation by plant personnel:

Indicate if complaint relates to violation of a CEC requirement:
Date complainant contacted to discuss findings: _____

Description of corrective measures taken or other complaint resolution:

Indicate if complainant agrees with proposed resolution:
If not, explain:

Other relevant information:

If corrective action necessary, date completed: _____
Date first letter sent to complainant: _____(copy attached)
Date final letter sent to complainant: _____(copy attached)

This information is certified to be correct.
Plant Manager's Signature: _____ Date:

(Attach additional pages and supporting documentation, as required.)

SAN FRANCISCO ELECTRIC RELIABILITY PROJECT
04-AFC-1
PREPARATION TEAM

Executive Summary	William Pfanner
Introduction	William Pfanner
Project Description	William Pfanner

Environmental Assessment

Air Quality	Tuan Ngo
Biological Resources	Susan D. Sanders
Cultural Resources	Beverly E. Bastion and Gary Reinoehl
Hazardous Materials Management	Alvin J. Greenberg, Ph.D. and Rick Tyler
Land Use	David Flores
Noise and Vibration	Steve Baker
Public Health	Alvin J. Greenberg, Ph.D.
Socioeconomic Resources	James Adams
Soil and Water Resources	Mark Lindley, Vince Geronimo, and Philip Luecking
Traffic and Transportation	James Adams
Transmission Line Safety and Nuisance	Obed Odoemelam, Ph.D
Visual Resources	Mark R. Hamblin
Waste Management	Alvin J Greenberg, Ph.D.
Worker Safety and Fire Protection	Alvin J. Greenberg, Ph.D. and Rick Tyler

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Facility Design	Shahab Khoshmashrab, Mark Hesters, and Steve Baker
Geology and Paleontology	Patrick Pilling, Ph.D., P.E., G.E.
Power Plant Efficiency	Kevin Robinson and Steve Baker

Power Plant Reliability ..... Kevin Robinson and Steve Baker

Transmission System Engineering..... Mark Hesters

Local System Effect..... Mark Hesters and Ajoy Guha

Alternatives..... William P

Compliance Monitoring and Facility Closure ..... Marc Pryor

Project Secretary ..... Theresa Epps

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION
FOR THE SAN FRANCISCO ELECTRIC RELIABILITY PROJECT

Docket No. 04-AFC-01
PROOF OF SERVICE
Revised 8/01/05

DOCKET UNIT

Instructions: *Send an original signed document plus 12 copies* **or** *an electronic copy plus one original paper copy to the address below:*

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 04-AFC-01
DOCKET UNIT, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Also send a printed **or** *electronic copy of all documents to each of the following:*

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DECLARATION OF SERVICE

I, Theresa Epps declare that on September 13, 2005, I deposited copies of the attached Preliminary Staff Assessment in the United States mail at Sacramento, California with first class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above. Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. I declare under penalty of perjury that the foregoing is true and correct.

Theresa Epps
[signature]

CEC INTERNAL
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Parties DO NOT mail to the following individuals. The Energy Commission Docket Unit will internally distribute documents filed in this case to the following:

JAMES D. BOYD, Commissioner
Presiding Member
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JOHN L. GEESMAN, Commissioner
Associate Member
MS-31

Stan Valkosky
Hearing Officer
MS-9

Bill Pfanner
Project Manager
MS-15

Dick Ratliff
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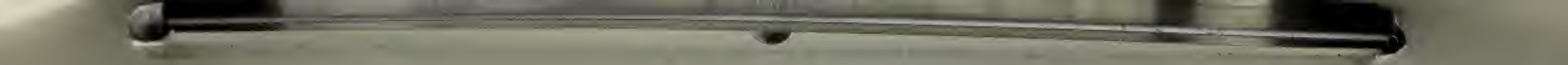
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Public Adviser
MS-12